

Comments Received About A Proposed Change to the Bear Baiting Rule (Negotiated Rulemaking Process)

The following comments were submitted to Idaho Fish and Game from January 5, through January 21, 2014



Negotiated Rulemaking - Bear Baiting Comments

Jerry Jayne

Jon -

I am surprised to learn that F&G allows black bear baiting in grizzly bear habitat, and can only wonder why.

I support this proposal, as far as it goes, but my hope is that you will someday soon just prohibit bear baiting. It does not seem like "fair chase"; more like a sissy way to "hunt" bears.

Jerry Jayne 1568 Lola St. Idaho Falls, ID 83402

Submitted Jan 5 2014 - 2:20pm



Negotiated Rulemaking - Bear Baiting Comments

Mike Adams

I do not support the proposed bear baiting changes for the Upper Snake/Island Park zone. This restriction is essentially one step away from eliminating baiting in this area altogether, and is not going to reduce human/bear interactions, nor will it acclimate the bears to human food sources. Until the growing bear population in this area is controlled, there will be increased contacts between humans and bears. Bears that are seeking human food sources will find it, as long as the bear population grows, and the number of people using the area steadily increases as well.

Submitted Jan 6 2014 - 11:12am



Negotiated Rulemaking - Bear Baiting Comments

Khris Kofford

I think the proposal is fine. thanks KK

Submitted Jan 6 2014 - 12:12pm



Negotiated Rulemaking - Bear Baiting Comments

Harold Rose

Daryl;

Just wanted to take a moment and express my thoughts on the new proposal for bear baiting in Grizzly areas. I am glad that the department is being proactive on this issue. I agree with what is being proposed with the exception of roadkill salvage. I have mixed emotions on that one. If I understand correctly that would change the rule of using wildlife parts for bait. ??? I like that the roadsides would definitely be cleaned up and rarely would a dead deer be seen along the highway, but I am not convinced I would like some "hunters" having that freedom for this reason. Baits are rarely ever checked and who would monitor if the wildlife is registered roadkill or a poached animal being discarded under pretense of roadkill. For the majority of folks out there, no concern is warranted, but there are some that would have one more opportunity to find a loophole they can manipulate.

I strongly feel that if someone wants to work for a bear, they deserve a chance to take one. I also feel strongly that something has to be done to make baiting look more acceptable to non-hunters. As the grizzly bears become more and more accustomed to baits, I am certain more problems will occur so, for that I am glad plans are underway to help alleviate those as much as possible. I would never want to be in your shoes as this ball rolls forward, but if I can help in any way, let me know.

Harold Rose BYU-Idaho Bowling and Skating (208)496-7460 Office (208)313-1564 Cell

Submitted Jan 6 2014 - 3:50pm



Negotiated Rulemaking - Bear Baiting Comments

Mike Adams

I do not support the proposed bear baiting changes for the Upper Snake/Island Park zone. This restriction is essentially one step away from eliminating baiting in this area altogether, and is not going to reduce human/bear interactions, nor will it acclimate the bears to human food sources. Until the growing bear population in this area is controlled, there will be increased contacts between humans and bears. Bears that are seeking human food sources will find it, as long as the bear population grows, and the number of people using the area steadily increases as well.

Thank you.

Mike Adams

Submitted Jan 6 2014 - 3:53pm



Negotiated Rulemaking - Bear Baiting Comments

Richard Rusnak

Daryl, I am writing to voice my concerns over IDF&G's proposed changes to black bear baits. The proposal is not a bad proposal, but I feel it is still unwise to use any and all baits in this region. My reasons are due to the proclivity of grizzly bear to more frequently use the lands adjacent to YNP. Baiting of black bears should be eliminated in the E. Idaho hunting zones.

It seems unwise and sets up a condition in which dangerous interactions between Grizzly and hunters will likely occur. A food conditioned Griz is also likely to result in dangerous interactions with a non hunters, local residents or tourists. After all we know how successful the park service's program became in remove all trash from Yellowstone and thus practically eliminate bad bear/human interactions. Essentially the departments proposed baits are trash.

Does the IDF&G department want to risk the very likely death or severe injury of a bait fed grizzly bear (that Idaho hunters cannot legally harvest) that in turn is habituated to seek out more food from nearby residents/cabins/campgrounds? Especially as more Grizzly bears are moving out of the boundary of YNP in search of food as their natural food sources decline due to climate change or other as yet unidentified factors.

I can foresee circumstances where a baited griz and subsequent injury/death could lead to messy legal ramifications for your department.

Thank you for the opportunity to comment.

Regards, Richard Rusnak

2400 S Wildrye Way

Nampa ID, 83686

Submitted Jan 6 2014 - 3:54pm



Negotiated Rulemaking - Bear Baiting Comments

Brent Larson

Steve...I think this is a good change. I struggle with the definition of natural foods. I think it should include any animal carcass. I am not convinced that eating pieces and parts of a dead cow or horse as makes a livestock killer out of a bear. For years the state of Wyoming had a prohibition against processed foods...donuts, bread, honey, but they allowed domestic animal parts to be used. As I recall the bait had to be placed in a container. That reduced the number of hunters that led a horse into the backcountry to shoot it for bait. My perception was that the animal parts used by most bear baiters did not result in widespread attacks on livestock.

Brent L. Larson Forest Supervisor Caribou-Targhee National Forest Service (208) 557-5761 (office) (208) 419-8440

Submitted Jan 6 2014 - 3:58pm



Negotiated Rulemaking - Bear Baiting Comments

David Ray

I'm against this change. It could be a first step to eliminating all bear baiting in the future on some perceived fear of conditioning bears etc.. After all why is this a concern for only these areas? Becasue there may be a Grizzly bear there? Is the conditioned Grizzly bear have some right to be protected that a conditioned Black bear does not have in another unit? This is the argument that the anti-bear baiters will make in the future to expand on this proposal if it passes. My FG dollars will go to more litigation in the futire trying to close the door your proposing to open here....Please don't open the door. It does not pass the smell check to me....Does the IDFG have any scientific data to support the need for this proposal? Thanks Dave Ray

Submitted Jan 7 2014 - 10:19am



Negotiated Rulemaking - Bear Baiting Comments

Jack Hutson

I accept that bears seek bait sites already providing non-natural foods; what I cannot understand is how big of an issue is it for bears to continue to focus on non-natural food resources to the point that they become a problem? What I am asking is, "If it is currently a huge problem, then why has the F&G Dept of Idaho (and other states) allowed it to continue with any bear species"? If it hasn't been a huge issue with black bear, then why would grizzlies be different? How much information is available on the tendency of bear species to focus solely on non-natural food sources? For example, I have baited on property within a mile or two of an occupied home, there seemed to be no increase in bear sightings near the house (that used simple plastic garbage containers). Perhaps the answer isn't as much the bait type as it might be the bait site's proximity to further human interaction (public camp-sites, towns, farms, etc.)? The ruling may help keep roadways free of road-kill but could it inadvertently increase poaching?

Anyway, I wholeheartedly support bear ID course requirements. I have enrolled in a similar course required in Montana; it was informative and no inconvenience to take or pass.

Submitted Jan 7 2014 - 4:44pm



Negotiated Rulemaking - Bear Baiting Comments

kevin price

Good idea, this should be a standard rule for all bear baiting so as not to condition black bears to seek out "human food" as well.

Submitted Jan 7 2014 - 9:44pm



Negotiated Rulemaking - Bear Baiting Comments

David Smith

If this rule passes as proposed, would the F&G Commission through the ability to determine "seasons" be able to expand the limits on processed food (that deemed non-natural) use in bear baiting to other hunt units without regard to grizzly bears being present? Another way to ask this may be, What would be required in order for bear baiting with processed foods (that deemed non-natural) to be eliminated or restricted in any Idaho hunt unit, once the current proposed rule was in place? Thanks.

Submitted Jan 8 2014 - 12:50pm



Negotiated Rulemaking - Bear Baiting Comments

Joe Bear

Stupid idea. Leave baiting as it is!

Submitted Jan 8 2014 - 4:52pm



Negotiated Rulemaking - Bear Baiting Comments

Blake

The grizzly bear population has increased to a point that they need to be managed. There needs to be a season on grizzly bears. Instead of shutting areas down that are acquiring a grizzly bear population. There are plenty of bears black and grizzly. The nuisance bear is the grizzly.

Submitted Jan 8 2014 - 7:21pm



Negotiated Rulemaking - Bear Baiting Comments

sal palazzolo

I fully support the Department in implementing this rule change.

Submitted Jan 8 2014 - 8:30pm



Negotiated Rulemaking - Bear Baiting Comments

Jeff Jacobson

I appose this rule. We need to quit taking away opportunities from sportsmen. This is the reason we live in Idaho. There has been plenty of habitat set aside for the grizzlies. Grizzly population has been on the rise for a long time. Its time to start managing the grizzly population.

Submitted Jan 8 2014 - 9:18pm



Negotiated Rulemaking - Bear Baiting Comments

Ivan Mott

In general, I do not support the proposed rule. Specifically, I find the "natural bait" definition vague and difficult to interpret. For example, do the "roots, and berries" need to be indigenous to the specific unit? Can farm raised strawberries, blackberries, or blueberries be used? How about potatoes, beets, sweet potatoes, carrots (which are loosely considered plant roots)? Do these natural foods need to be collected from the units in question to be legal? To be natural, must plants also be "native" and "non-introduced"? It appears that domestic meat carcass or scraps are not allowed, which I don not understand? The rule on skin removal is not clear...will it be legal to bait with meat with skin ON in these units, or no mammal meat can be used at all in these units? Is there non-edible game parts (presumably organs) that are covered with skin? How about a bacon scent "Bear Bombs", would they be legal? It appears that a dual degree in Botany and Law will be needed to interpret this rule (I say this mostly serious, as I myself am a PhD Scientist, but lacking a law degree).

Simple is better, therefore I propose leaving baiting legal, as currently defined for these units.

If science in conclusive that feeding bears doughnuts, or rolled oats, or beef scraps, leads to Grizzly-human conflicts (which I do NOT believe), you should ban baiting altogether in these units.

If the rule change is adopted, I do not understand why domestic meat scraps cannot be used with skin off, and the rule should be amended to allow this. Moreover, the definition of 'Natural food needs further clarification.

Submitted Jan 9 2014 - 9:13am



Negotiated Rulemaking - Bear Baiting Comments

Ruel Barker

Dear Sir: The new program is very very disappointing to me and my family. We have participated in the LAP program off and on for many years. We own approximately 1100 acres in Elba, Cassia Co., Idaho. If I read this document right only those with 5000 acres or more will be given the privilege to participate in the LAP program.. I do not understand why only the large land owners are give this opportunity. On my 1100 acres are many streams for fishing and habitat for hunting. I have never posted my property and have always allowed the public to fish and hunt as they pleased. This new seemingly discriminatory LAP policy will personally persuade me to post all my land and shut the public out. I'm sure many of the several hundred landowners the new policy are cutting out of the program so that you can serve the more wealthy landowner will feel the same. Again, I am very disappointed in this action. It makes me very suspicious that the Idaho Fish and Game Department is following the trend of American politics that we cater to the big people and who cares about those who have less. I better not say more because the whole issue is just making me angry and what I say isn't going to matter anyway.

Submitted Jan 9 2014 - 9:50am



Negotiated Rulemaking - Bear Baiting Comments

scott

The problem i see with your "natural bait" in grizzly country is grizzlys are everywhere! i personally dont think changing the baiting rules will do a damn bit of good for human/griz encounters. if a bear smell somthing and wants to see what it is, its going to. if you want to minimize the grizzly human encountes put a season on them. they have no fear of humans like a black bear does. thats because blackies have been hunted and knows a foreign smell meens posible danger, last year i had more griz. come into my bait and eat in the middle of the day and evenings with me sitting thier than i have seen black bears in the last 4 years. the only way to reduce incounters is to reduce grizzly population. i wish Idaho would grow a set and tell the FEDS and tree huggers we will regulate the bears and wolves the way Idaho sees fit, and not how a bunch of clowns from back east who have never even been to Idaho thinks it needs to be ran. lets throw a few grizzlys and wolves in central park and see how cute those idiots think they are then

Submitted Jan 9 2014 - 10:12am



Negotiated Rulemaking - Bear Baiting Comments

Mark Collinge

There appears to be a seemingly minor, but actually very significant error in the 2nd sentence of 13.01.17.100.03 d. of the preliminary draft rule. The word "edible" should be changed to "inedible" to be consistent with the language in the next-to-last paragraph under the "DESCRIPTIVE SUMMARY" section of the preliminary draft rule. I assume the intent of proposed rule's definition of "natural bait" is to allow inclusion of the inedible parts of legally taken game fish and game animals, but not the edible portions of those legally taken game animals. I'm pleased to see this provision in the proposed rule, as it gives me hope that IDFG may eventually rectify an inconsistency I've previously pointed out in their rules. It makes no sense that fishermen can legally use entire game fish for bait, but trappers aren't allowed to use even the inedible portions of game fish or game animals for trapping bait.

Submitted Jan 9 2014 - 10:43am



Negotiated Rulemaking - Bear Baiting Comments

Mertello Baird

Thanks for the letter asking for my opinion about bear baiting. As I read to letter I notice now we are going to allow game animals-Non edible parts. I see a problem. Who gets to determine what is edible. If I don't eat on portion another person may. I see a bunch of people getting tickets for want and waist. Not because they were trying but because nobody uses the same parts. So a Game officer gets to make the call. (I see Problems)

Next the What is the difference between a dead Jackrabbit and a dead Lamb. (besides the obvious) Once they are skinned the way they have been in the past they are just dead animals. I don't see how one dead animal will teach a bear to be dependent and became a problem, and another dead animal will not.

LAST how on earth did Honey became not a natural? I have found Honey Many Many times in the mountains

Submitted Jan 9 2014 - 12:21pm



Negotiated Rulemaking - Bear Baiting Comments

James Wolcott

My name is James Wolcott. I have hunted in unit 60 for black bear for 14 years now! I have noticed that the griz ecounters are over meat instead of sweets! If we are to change the baiting it will draw more bears into camp sites and into city's. I have seen first hand that the more meet that you place on a bait sight, the longer the grizlies will stay! Please do not change our baiting.

Submitted Jan 9 2014 - 12:34pm



Negotiated Rulemaking - Bear Baiting Comments

jeff

This would be HORRIBLE!!!! Wyoming baits bears in Grizzly country. So can Idaho. The black bear numbers are very large and need managed!! Unit 61 is dense forest. We need to continue baiting for proper management. All the bear baiters would then move to units such as 59 and it would be congested with baits. The only thing that needs to happen here is start managing the grizzly bears!!! Bear baiting is a great privilege for Idahoans. By banning one unit your making it an option state wide. We need to keep it open to bear baits. You'll always have problem bears regardless!! Youll just have more problems if this goes into effect because the bear population will increase. There's already lots of bears as is in unit 61. Keep is open to baiters!

Submitted Jan 9 2014 - 1:50pm



Negotiated Rulemaking - Bear Baiting Comments

Jeff Morris

Do not touch the rules regarding bear baiting in any unit. This seems like a tactic that is used to start the process of eliminating baiting all together. This to me has nothing to do with grizzly bears.

Submitted Jan 9 2014 - 1:56pm



Negotiated Rulemaking - Bear Baiting Comments

Brian Batt

I feel that bear baiting is hard enough with the non-natural bait, trying to find enough natural food will just make it even more difficult. I understand the concern of the grizzlies getting use to eating human food but maybe the issue is the increase in grizzly population. I have heard of more people seeing grizzlies and I have even seen a grizzly in an area I thought none lived. My suggestion is to leave the rules as they are now written by being able to use non-natural bait.

Submitted Jan 9 2014 - 5:16pm



Negotiated Rulemaking - Bear Baiting Comments

David Hoyer

I would like to see statistics on the number of grizzlies that have become habituated. I think it's crazy that the rule proposing natural baits includes baits illegal in the rest of the state. If you are going to restrict some hunters at least make some common sense additional allowances and rules to increase use of proposed beneficial natural in the rest of the state. Also legalize baiting in unit 1 with natural bait.

Submitted Jan 9 2014 - 7:04pm



Negotiated Rulemaking - Bear Baiting Comments

Mark Morris

I have not found or heard of any grizzly bear that hit my bait that also became "food conditioned" to the bait I used. I firmly believe that your agenda is to eliminate bear baiting in the proposed areas described in your letter. You also will need to address the change in using parts of game animals and game fish that are currently outlawed to be used as bait. You need to upfront and honest and propose to ban bear baiting in these areas and not allow hunters to use "new forms of bait" that are marginal, at best, especially during the Spring season. I believe the only reason for this "natural Bait" is to provide revenue for Idaho Fish & Game. If you change the baiting in this area, I will not hunt with bait in Unit 60, a unit where I have personally harvested many nice black bears over the past 13 years. I have noticed a large influx of grizzly bears as well as wolves in Unit 60. Could it be that we just have more grizzly bears than ever before and this is the reason for the uptick in human-grizzly conflicts? I believe that could very well be the case since the number of grizzly bears I have seen has grown to a large percentage of the bears I have seen and black bears have diminished in percentage. What really needs to be done, is to have a grizzly bear hunt to reduce their numbers. You know as well as I do that the federal government broke their promise to sportsmen and ranchers by not "delisting" the grizzly in 1998 and turn management over to the Fish & Game Department when their research found the number of bears in the greater Yellowstone ecosystem surpassed their goal for "delisting" the species. Since that was 15 years ago and no hunting has been permitted, we now have the same problem we have with the wolves that have displaced elk herds in Idaho, only the grizzlies get into conflicts with people. Imagine that, no management yields over population, an unbalanced game population, and therefore, we have problems caused by over population.

Submitted Jan 9 2014 - 8:06pm



Negotiated Rulemaking - Bear Baiting Comments

Zack Hale

I have enjoyed hunting for black bear in eastern Idaho for several years and most recently hunting with my son on his first black bear hunt. I think that the proposed 'natural bait' listed would be very hard for most hunters to accuire in the amounts necessary to run an effective black bear bait site for any amount of time which would in essence close the proposed areas off from black bear baiting for most hunters. I think that most black bear hunters who have actually ran an effective bait would agree that if there are more than a small bear or two visiting the site, they can consume a huge amount of food in just a few days. In addition to that, there are many other animals and birds that often eat from the bait as well once it has been discovered. For those of us who can only hunt on weekends due to work and family obligations it often takes several weeks to see a bear to harvest, during which time we must keep the bait stocked in order to keep the bear actively using the area. I think it would take an inordinate amount of time and expense to acquire enough weasels, jackrabbits, raccoons, roots, berries, etc... to make setting a bear bait even close to worth the effort. If the proposal is passed as is, I will most likely hunt bears in other areas or find a different passtime altogether.

Submitted Jan 9 2014 - 11:52pm



Negotiated Rulemaking - Bear Baiting Comments

Ken Frerichs

My concern is that this is a foot in the door rule that will eventually result in more hunting laws being out of control.not a good idea at all. Responsible sportsmen are aware of the areas they hunt and the dangers they may encounter. Letting this pass could potentially be as bad as releasing Canadian wolves for hunters and our rights. One thing leads to another and pretty soon you can't ever get control of what you've lost.

Submitted Jan 10 2014 - 7:48am



Negotiated Rulemaking - Bear Baiting Comments

Randy Gamett

I don't think it is a good idea to change the current rules. Bears are not relating dumpsters and trash bins to food sources just because of our current baiting techniques. Bears have been eating out of dumps and bins even before baiting for bears with processed food for bait became a popular sport. Bears have great noses and will investigate any unusual smell that may be a source of food. Human populations have increased and we have a larger population of people living in bear country resulting in more interactions.

Submitted Jan 10 2014 - 9:18am



Negotiated Rulemaking - Bear Baiting Comments

William Eckerle

Dear Mr. Meints:

I support the proposed Idaho Department of Fish and Game rule change for limiting black bear bait to "natural bait".

 $http://gallery.mailchimp.com/223db33acbd15a9e2c6eacd3f/files/Proposed_Changes_for_Black_Bear_Bait_in_Grizzly_Country.pdf$

Where I live in Alta, WY (part of Teton County, WY) in a county-designated bear management area. We have enough problem bears, both black and grizzly here and want as few human food-conditioned bears along the Idaho-Wyoming State line as possible.

Thanks for your consideration in the interest of protecting our property and safety,

William Eckerle 130 Targhee Towne Road Alta, Wyoming 83414

Submitted Jan 10 2014 - 9:43am



Negotiated Rulemaking - Bear Baiting Comments

Brian Christensen

This rule would essentially eliminate bear baiting in those units involved. The bear harvest would drop and there would be more problems with bears. Your list of allowed bait that was sent out is actually illegal. Quoting directly from the big game handbook

"No parts of animals or fish that are currently classified as game animals or game fish in Idaho may be used as bait. This includes game animals and fish that come from the wild and commercial domestic sources (i.e., pen raised game birds/animals or hatchery raised game fish)."

Scratch off the first two in the "allowed bait list" Road kill is actually big game animal and is therefore prohibited-

Having spoke with several conservation officers I have been told that furbearers are "game animals" and they cannot be used for bait. That leaves us with "naturally occurring fruit (what ever that means), predatory wildlife (which bears won't touch, and non-game fish.

This rule will eliminate bear baiting in the above listed zones and you will have more problems with bears. The problems is the explosion of grizzly bears, hunting them will curb this problem.

Submitted Jan 10 2014 - 11:25am



Negotiated Rulemaking - Bear Baiting Comments

justin stevenson

End all bear baiting in areas where there is a population of Grizzlies.

Submitted Jan 10 2014 - 12:26pm



Negotiated Rulemaking - Bear Baiting Comments

Dale O. Batt

I understand the conditioning problem with the grizzly but maybe this is a problem of having too many grizzlies. We have seen grizzlies in places they were never in before. If the bears go unchecked/uncontrolled it won't be too many years and bear baiting will be all natural and very dangerous. I believe we should leave the baiting rules the way they are and focus more on controlling the population of the grizzly. Thank you for giving me the opportunity to express my opinion.

Submitted Jan 10 2014 - 12:27pm



Negotiated Rulemaking - Bear Baiting Comments

Nicholas Muckerman

I do not support this. This further strips away rights of hunters. Maybe Idaho should make a state law that requires all of the people living in these units to eat only "natural food" to avoid conflict with bears. Or maybe they should just be required to leave for the precious grizzly bears.

Bears are omnivores. They will eat whatever they can. The grizzlies will keep expanding until states are given power to regulate them. Instead of limiting the rights of hunters, start getting your legislation ready for the eradication of grizzly bears in all of Idaho other than Yellowstone. Ever single one of them is a "public safety concern and are an expensive liability to state and federal agencies" as you put in your summary.

Quit caving in to the left and start defending the voices of the hunters. By and large, it is the hunters that are paying your salary.

Furthermore, it is ridiculous to say that it will only affect 50 bait tag holders. When a person buys their three bait tags, they are asked where they hunt. First, this may or may not be where they hunt. Second, many hunt different units and are only given the chance to name one. This may effect more than 50 bait tag holders. It effects all bear hunters and all Idaho hunters in general as it is a blow to our current hunting rights. This is a slippery slope. Care about what the hunters think a little bit more and stop caving to the concerns of some tree-hugging, bear kissing, animal rights activist landowners who choose to live in grizzly country (the guy living near Spencer off of Camas Cr. Rd.)

Submitted Jan 10 2014 - 12:44pm



Negotiated Rulemaking - Bear Baiting Comments

Cody Camphouse

I think the proposed changes are a great idea but if the changes are only concerning grizzlies being affected then I feel baiting should be legal in all units

Submitted Jan 10 2014 - 12:59pm



Negotiated Rulemaking - Bear Baiting Comments

Jared Poole

Could you be more clear on what isn't allowed in these baiting areas. It doesn't say anything about the processed foods that were mentioned on the previous page. I agree and disagree with the proposal. If there is a problem with bears becoming food conditioned and wandering into populated places I haven't seen it in my 36 years of living in Swan Valley. Not that it wont ever happen. It also shouldn't matter if it is in grizzly country or not. If there is going to be a bear problem then it will be a problem whether grizzlys are present or not.

Submitted Jan 10 2014 - 1:59pm



Negotiated Rulemaking - Bear Baiting Comments

scott e hill

Hi just some thoughts from me.

You already have the authority to close areas to hunting if nuisance bears are a problem.

If you restrict baiting of wolves, bears, etc., the population will explode, like when we had the band on hunting wolves.

Look at your data, how many bears were taken by chance encounters with hunters compared to encounters with bear baiting hunters.

More bares, wolves will mean more human encounters, good or bad.

More restrictions on baiting leads to less participation, and more enforcement violations with proving legally or un legally obtained game / none game violations.

To try to reduce food-conditioning of nuisance bears by limiting bear baiting, is the same argument as stopping gun violence by gun registering!!!.

Bear baiting is not the problem, the problem is that people leave garbage and trash in camp sites and trails and road sides all around the state, fix that problem!!!.

Grizzly Bears have no natural fear of man, un like Black Bears, Wolves, Coyotes.

Black Bear encounters are small because they are hunted, and they know they must use there senses to avoid human contact or be harvested.

Grizzly Bars have no fear of human encounters or of being harvested, this is route problem.

I think to fix this, you must introduce special limited hunting of Grizzly Bears by permit, this will over time instill the natural fear of human encounters / contact, like the Black Bears have.

If Grizzly Bars are at risk of being harvested over free bait / camp site garbage /road side trash, they, like Black Bars will learn avoidance behavior of humans.

Point in fact, if you see a Coyote and you stop the car to get a bettor look, he will be gone by the time you can open the door and get out, this is true avoidance behavior.

Wall I have your attention, with the innovation of ultra high power rifles (30-378) and optics the sportsmanship has been taken out of hunting, it is past due time to limit big game hunting to non magnifying optics.

The undue advantage of high tech weaponry is not sportsmanship, and it also promotes safety and wounding of game at long distances.

Real sportsmanship promotes a fair advantage for Big Game.

Thank you for your time.

Submitted Jan 10 2014 - 2:22pm



Negotiated Rulemaking - Bear Baiting Comments

Kelly

There are very FEW cabins in the Kilgore ID unit 61 area. This new law is not necessary at all! How do you expect bear baiters to find bulk of fruit and stuff to bait with in the spring. You are pretty much shutting down bear baiting in a heavily populated black bear population! This new law would make it impossible for bear hunters to bait. You can't enforce these rules. It would be to expensive to bait. To many wolfs, grizzly and black bear in the unit. We need to stay on top of management! This is the worst idea ever! That country has been baited for ever, don't just up and take that opportunity away from the bear hunters! I know all the kilgore residents and ranchers and cowboys out there!! There haven't been issues with grizz breaking into cabins anyways! if there is its because theres too many griz! regarldess if the law goes into effect you will have grizzly people encounters because of high griz numbers now. NOT BECAUSE OF BAITS!!

Submitted Jan 10 2014 - 3:39pm



Negotiated Rulemaking - Bear Baiting Comments

JEFF

You would create a much bigger problem by not keeping up with the regular baiting rules. Do you really want an explosion of black bears in an already high population zone! You guys are all about making money so I don't get why you would suggest this. makes no sense. You would add heck to the surrounding untits for the other bear hunters as well. I don't know any one who would continue to bait with these ridiculous rules

Submitted Jan 10 2014 - 3:46pm



Negotiated Rulemaking - Bear Baiting Comments

Brent McFarland

I would like to see factual scientific evidence of the statement made in the descriptive summary which states bear baiting leads to nuisance bears. Nuisance bears can be created through multiple processes, such as loss of habitat, not being hunted by people, increase of people recreating in bear habitat, lack of natural food sources (resulting from the grizzly and wolf population) and in my opinion, in the case of the Yellowstone grizzly, an over population/density.

The statement made in the descriptive summary has all of the signs of anti-hunter rhetoric that has no factual foundation. The bear encounters that come to mind over the past few years have mostly occurred within the National Parks, far from any areas that allow baiting. This factual evidence does not support the foundation of this proposed rule.

Until factual evidence is presented showing that there has been an increase in nuisance bears which is the result of bear baiting, and not the result of an increase in bear population or some other reason, this proposal should be removed.

Submitted Jan 10 2014 - 7:14pm



Negotiated Rulemaking - Bear Baiting Comments

Robert Brown

In response to the proposal to change baiting for black bears, I disagree with the proposal to limit the type of bait used for black bears. First of all, bears cannot tell the difference between livestock and "non edible parts" of "classifed" game animals (rotten meat is rotten meat). Second, if there is a problem with nuisance bears in costing the State of Idaho revenue to handle these bears, there are obviously too many bears. The solution is not to limit the type of bait hunters can use, but to open up to all types of baiting, as well as increase the number of bears allowed to be hunted. De-listing the grizzly bear could also be a solution to your problem. After watching bears for 25 years in Alaska wilderness, bears come to anything they smell, whether it's a downed animal or human garbage, and it doesn't matter what they have eaten prior to that; they simply follow their nose, because, as you know, they are preparing for hibernation. I can't help but think that this is one of the first steps in elimation of baiting altogether. Just my personal thoughts.

Submitted Jan 10 2014 - 8:32pm



Negotiated Rulemaking - Bear Baiting Comments

Chris Trubl

It may be only listing the areas of unit 60, 1/3 of the western part of unit 61, and in that portion of game management unit 65 east of state highway 33. My question is how long before it includes more units that just get added? Plus, conditioning is not from hunters baiting in Spring and Fall. It would be caused more by people living or camping that are not taking care of their trash, dog foods, or personal property when they are not putting it away or securing it.

Submitted Jan 10 2014 - 9:32pm



Negotiated Rulemaking - Bear Baiting Comments

Charlie Dally

Strongly opposed to this proposed rule change, not to mention that limiting the way hunters can bait black bears will further discourage them from purchasing bear baiting permits and decrease revenue for fish and game. It's been a proven management tool in the past and in my opinion think it's a bad idea. Thank you!

Submitted Jan 11 2014 - 12:09am



Negotiated Rulemaking - Bear Baiting Comments

Kirk Jessop

I wish you guys would ban both baiting and hound hunting. Hound men are always running bears off of others peoples bait sites. They are the trash of the hunting world in my opinion. Montana only allows spot & stalk. Why does'nt Idaho adopt that rule?

Submitted Jan 11 2014 - 7:56am



Negotiated Rulemaking - Bear Baiting Comments

Jonathan Hall

This proposed bear baiting rule has not been thought out thouraly. By using all natural food for bait it will make it harder to get, store, and haul bait. It will also not change your problem, or nuisance bears.

When I used bread, donuts and sweet oats in island park I see the occasional grizzly bear. When I use straight meat the grizzly bears that find my bait return and don't leave. I am an avid bear baiter and I don't like to feed grizzly bears. But with this proposed change it will be harder to target black bears.

I bear bait starting the day it opens untill the hound season ends at the end of September. I maintain three baits, I have never been attacked. You want to change the rules for nuisance bears that are causing problems at camp grounds, boat docks, parking lots and houses. The bear baiters aren't causing these problem bears, the general public is being careless and conditions the bears. The bears know that there is food at my bait, they come back to my bait to eat. They also know, because people are careless, that there is food at that parking lot dumpster, or camp site.

Changing what I can or can't bait with will not fix the nuisance bear problem. You need stricter laws and enforcement in public areas where your problem bears are. I am against the bear baiting change. Leave the bear baiters alone we are not getting hurt or attacked and we walk into where we feed them on a regular bases.

Submitted Jan 11 2014 - 8:19am



Negotiated Rulemaking - Bear Baiting Comments

Jared Sharp

I disagree with the use of natural bear bait. My family has a cabin within the bear bait area in Island Park. I don't agree with the idea that bear baiting conditions bears to human food. Yes, I'm sure bears like human food, but a bear bait in the forest does not bring a bear to a cabin in my opinion. It seems to me that a bear bait in the forest brings bears to that bait. A person leaving garbage outside of their cabin will bring a bear to their cabin. Someone cooking outside at their cabin can also bring a bear to their cabin, or feeding their dog outside. My opinion is that if a man never had a bear bait a bear would still come to a cabin if they are bar-b-queing or leaving food outside for the bear to smell since bears have one of the greatest noses. Where our cabin is we have seen bears walk right past it in the middle of the day to get a drink of water since we are right next to the only water for quite a ways around the area. If we build where bears live, or where they drink then bears will be by our cabins. To limit baiting to natural bait will make it almost impossible for people to find enough bait to even attract bears. It seems to me that the real result from this rule will just be that we will have more bears in the area because less bears will be killed by hunters. Is it not a fact that most bears killed in the area are off of baits. Another point that I would like to make is that if you look at the baiting area in Island Park there are not very many cabins within that area. So then if you look at the cabins that have complained about bear problems, most of them are not even within the bear bait area. The vast majority of cabins in Island Park are not even in the bear baiting area. So how are we associating these bear problems with baiting. It seems to me that it is the opposite. We should open baiting in all of Island Park so we can reduce the number of bears. I have had 11 bears come in on one bait site in the spring. There are plenty of bears and if we limit the hunters there will just be more.

Submitted Jan 11 2014 - 2:21pm



Negotiated Rulemaking - Bear Baiting Comments

JARED STOLLER

LEAVE BEAR BAITING THE WAY IT IS DONT CHANGE THE RUES. THANKS

Submitted Jan 11 2014 - 8:04pm



Negotiated Rulemaking - Bear Baiting Comments

Jared Wilding

Limiting the types of bait used for baiting in unit 60 is not going to solve any of the problems that you are saying it will. Bears are going to look for the easiest food source possible, weather it be donuts and cookies or dead animals and carp. They will always take that option. The main problem that you are facing is the over population of grizzly bears in the area. The bears have no natural predators and therefore have no reasons not to come near campgrounds and cabins in the area looking for food. I use to hunt the Island Park area but have since relocated due to the amount of grizzly bears and wolves in the area which have devastated the wildlife herds. They have also now made the hunters in the area into the hunted. I seems that the federal government and fish & game would rather have an over population of grizzly bears in the area than people. It is far past the time that these bears are delisted and allowed to be managed instead of allowing them to get into trouble by getting into peoples food and garbage or even worse attacking someone and being destroyed.

I understand that this is a federal issue with delisting but why should the state limit the ways that people are allowed to hunt instead of pushing the issue of delisting.

Submitted Jan 12 2014 - 12:54pm



Negotiated Rulemaking - Bear Baiting Comments

Nathan Price

There has been no documented cases of grizzly bear attacks over "non-natural foods" There hasn't even been any documented cases of black bears doing that. Where the commission is facing the delisting of grizzly bears and enacting a hunting season, this ruling makes absolutely no sense. If there were to be any changes to the permissible baits, I would like to see it opened up to include those "natural baits" in addition to the "non-natural baits" because that would open up the variety of baits a hunter could use thus allowing for the bears to not become habituated to "non-natural baits" like the proposed ruling is trying to do.

Submitted Jan 12 2014 - 3:22pm



Negotiated Rulemaking - Bear Baiting Comments

Matthew Borg

Jon or whom it may concern,

On this issue of bear baiting. I understand your concern in baiting in grizzly country, we don't want to encourage them on eating human food. This is why we have the rule no baiting within 2 miles of any camping area. If this is our concern I don't understand why we don't make this a larger area...maybe 10 miles from any established camping area. If we go through with this proposed rule change, we will change the way we bait from Salmon to the Yellowstone Park boundary then to Caribou Mountain. Most of these areas only have a few known grizzly bears in these areas! So why change the existing program for one grizzly per ...? 150 miles. So we are going to shut down 150 square miles of bear baiting for one grizzly? This is similar to the fist change they made in Montana, which eventually lead to shutting down baiting all together. As soon as that happens, our bear numbers will increase to the point where they come down into civilization and create more problem bears than what we have now. I think we need to have some grizzly tags put out and the problem grizzlies should be euthanized, not the three strike program.

Bear baiting isn't the only thing that creates problem bears: over population, campers disposing of food incorrectly, people feeding them on purpose, and encroachment of cilivization, which will increase with lack of bear baiting options.

Submitted Jan 12 2014 - 5:12pm



Negotiated Rulemaking - Bear Baiting Comments

Domenique Borg

To Whom It May Concern,

I see many problems with your proposed changes. One being that there isn't enough road kill in Idaho to bait all the bears, not to mention enough people to "register" the road kill found. It's hard enough now to find bear bait material now let alone fresh roadkill or other such things. Will this increase people purposely running down or shooting animals for bear bait? Unfortunately, yes! Bears will become a bigger problem without baiting because we would have over population which leads to to many to feed, which leads to hungry bears, which leads to more aggressive bears, which leads to more maullings and such because they are hungry. Also, this is usually the first step to completely getting rid of bear baiting all together (just ask Montana). That creates even more problems like over population, no fear of humans, no way to keep the population down, or keep bears from attacking people, mostly women (who menstrate) and children (who cry). I can't see closing down hundreds of miles of land for one or two grizzlies who "might" become a problem when grizzlies are a problem because they are at the top of the food chain and have no fear of humans because they are protected. You say there is a problem with interaction between grizzlies and civilization, so make rules that protect camp grounds, like a larger field of safety like 5 miles or even 10 from campgrounds and houses. And just because you have laws doesn't mean anyone keeps them. I personally know of people in campgrounds who feed the bears on purpose so they could see them inside their campground when they are up there. Have you stopped them? How do you stop them? We are baiting legally and have to suffer the consequences of these unlawful people baiting bears! There has to be a better way. However, I have heard that grizzlies are to the point where they are being de-listed right now. That shows we have one of the biggest populations of grizzlies at this time (over population) which can not be fixed by only baiting with natural foods. Maybe you should think about euthanizing the problem instead of taking away bear baiting options.

Submitted Jan 12 2014 - 5:43pm



Negotiated Rulemaking - Bear Baiting Comments

Payton

I'm fourteen years old. My cousin always has a bat over in unit 61. I have been real excited to go. He said we won't be able to go this year if the rules change. Please don't change any rules. I've been looking forward to this for to long

Submitted Jan 12 2014 - 6:38pm



Negotiated Rulemaking - Bear Baiting Comments

Greg

This will hurt fish and game. You guys got to relize all the people that have been baiting over the years. The reasons for the laws make no sense. I would show up to a meeting on not going through with this so you better have a meeting

Submitted Jan 12 2014 - 6:55pm



Negotiated Rulemaking - Bear Baiting Comments

Erik Kelly

I do not agree with the proposal as it is to difficult to understand what is legal to use and could lead to problems with distinguishing exactly what is in a bait pile/barrel. Also I would like to suggest that all units in the state be opened for bear baiting. With the wolf influx the hound hunters have stopped hunting and I have encountered a large number of bears recently. I would love the oppurtunity to bait one up and take with my bow.

Submitted Jan 12 2014 - 7:15pm



Negotiated Rulemaking - Bear Baiting Comments

Bruce Mincher

Hi Daryl, hope this finds you well.

In response to the rule change for bear baiting in the grizzly bear recovery areas (units 60 and 61) I offer the following comment:

In contrast to the statement in the newsletter, I do not believe that baiting using "non-natural" attactants habituates bears. Habituation occurs at camp sites and garbage cans in town, where bears learn to associate food with people. This is not the case at a baited site, where the idea is to ensure that the bears do NOT associate the bait with people. Further, I don't believe that a bear that finds and eats dog food (for example) at a bait site will next head to Cal Ranch looking for more dog food. He will, however, come back to that bait site- and perhaps not be in town with the garbage cans.

This is bad rule on two levels. First it will provide ammo to the anti-bear hunting folks who will now claim that Fish and Game believes that bear hunting causes problem bears, and second it will annoy the bear hunting community while providing no benefit. I hope we do not enact this one....thanks for the opportunity to comment. If we have meetings I'd like to be there....thanks, Bruce

Submitted Jan 13 2014 - 7:12am



Negotiated Rulemaking - Bear Baiting Comments

James Dietze

I am writing to comment on the proposed changes to bear baiting.

I strongly oppose these changes. Making these changes opens the door to changes being made to all hunting zones that have the potential to have grizzlies within them.

I would rather see efforts being put towards the delisting of grizzlies so that a controlled hunting season could be had on them. As it stands now, grizzlies have no fear of man, and no reason to fear man. Changing baiting practices would be a band aid fix at best, and has the potential to spread to all hunting zones and cause far more damage to hunting via further restrictions. Further more In relation to grizzly bears, the use of natural bait creates a problem from my experience. While there is no way to keep grizzlies out of a bait site they tend to come once and not return to a site that uses non-natural baits (day old donuts, bread and other sweets), use of legal animal parts tends to keep the grizzlies coming back. At least that is what I've found in Alaska. Possible short sighted solutions to undefined problems can often create unwanted consequences. Changes to a system that doesn't have a specific problem is usually a bad thing to consider.

I do not support any changes to bear baiting practices in Idaho.

Sincerely,

Submitted Jan 13 2014 - 7:30am



Negotiated Rulemaking - Bear Baiting Comments

chance

If they are worried about keeping the grizzles in check lets give 5 tags out a year, and start managing them a Little as well. it seems to me that if a black bear or griz smells food in somebody's camp, they are going to try and eat it, if they have been baited with non-nautual food or not. if something needs to be worked out, we need to get together as hunters. andlagree on something that will make hunters and non hunters some what happy.

Submitted Jan 13 2014 - 12:04pm



Negotiated Rulemaking - Bear Baiting Comments

Dan Stark

I strongly oppose the proposed changes to the Black bear baiting rules. I strive to be a law abiding and ethical hunter, and I enjoy the pursuit of bear in Idaho. The unit I typically hunt is considered "grizzly country" although in all the years I have hunted it I have never seen any grizzly sign, (although I suspect this unit will be listed as grizzly habitat). The proposed changes will greatly constrain my own hunting as well as many hunters across the state while having negligible if any impact on grizzly behavior. Bear baiting is already strictly monitored and regulated and although it is greatly misunderstood by those who have not participated, baiting is an excellent method for hunters to get an ethical and hard earned harvest of the targeted species. Let us not forget that these same hunters have a vested interest in conservation and are the greatest contributors to the conservation of all animals.

In conclusion I want to stress the great burden the proposed changes will put on hunters while offering negligible benefit to the grizzly. I re-affirm my opposition to these proposals. Thank you for your time.

Submitted Jan 13 2014 - 12:40pm



Negotiated Rulemaking - Bear Baiting Comments

jeff

I also forgot to mention. The bear problems are in the areas where bait is prohibited. Look at Island Park and all the bear problems. No baiting allowed yet they have more problems than any other unit. Bears will be bears. They will seek food no matter what. Let hunters use what ever bait they want. Bear bait is bear bait. This natural bait Idea is ridiculous.

Submitted Jan 13 2014 - 2:10pm



Negotiated Rulemaking - Bear Baiting Comments

Keith Klingler

It's wrong to take any more of our rights away open a season on the griz and the bear hunters will fix your problem bears. That was easy ha. Right now the griz are dieing of old age.

Submitted Jan 13 2014 - 3:05pm



Negotiated Rulemaking - Bear Baiting Comments

Jay Cawley

It will not help with keeping the grizzlys out of baited units. We need to have a controlled hunt on the grizzlys.

Submitted Jan 13 2014 - 6:39pm



Negotiated Rulemaking - Bear Baiting Comments

Randy Heyrend

I have hunted bear for at least 25 to 30 years, In Idaho all over the regions. I feel that it should be left as is! In some cases bears are very hard to get or see, even using the present legal methods for baiting bear. It is a lot of work with sometimes to result of harvesting or seeing a bear. My opinion is to leave things as they are presently.

Thank you,

Randy Heyrend

Submitted Jan 13 2014 - 7:25pm



Negotiated Rulemaking - Bear Baiting Comments

Pamela Williams

No bait should be allowed in "fair-chase" hunting.

Actions which habituate bears to human food and trash are absurdly irresponsible.

Submitted Jan 13 2014 - 7:31pm



Negotiated Rulemaking - Bear Baiting Comments

Ethan Heyrend

I have gone Bear hunting with my family members since i was very young. I have enjoyed going and we have worked very hard at maintaining ethical bait sites. Many times unsuccessfully harvesting or even seeing a bear. We love the experience and i feel that things should be currently left as they are. I feel this way because it is going to be extremely difficult for any hunter to obtain such allowed bait sources. It is going to eliminate the average bear hunters that you will sell tags too. How is a bear hunter going to collect the legal food items and species that you guys are recommended for this change? If people do not trap, there is no way to get a beaver. You cannot just spot a stock most of these new items which are being referred to. Throughout the years of hunting with my family and by myself, i have not once seen a wild bobcat, marten, or a mink. Beaver, Coyotes and Badger very very rarely. There is a lot of older men who buy bear tags and bear bait, this will eliminate a lot of elderly people from hunting bear as well. It would be extremely difficult for these people to collect the allowed sources. This would also require those who would need to get the new food sources to purchase a trappers license and follow new rules and regulations around that. In some of our nearby regions they're are very few Fish and Game officers out in the field due to lack of resources. The people now who abuse the legal hunting regulations, are still going to use illegal techniques to do whatever it takes to harvest an animal. I have spent a lot of time in the mountains doing some scouting out to find some good places for a bait site, and frequently come upon bait sites that are untagged. There is also the issue of doggers. If it going to be that much more difficult to get an active bait site established, you will have more doggers illegally running your baits. Off of someone elses efforts, because they do it now. You may also run into the scenario where the normal hunter will struggle to find the baiting resources needed, and may buy them from other hunters or trappers. Trading for money to get the legal bait, which in the future will lead to less profit made from selling tags. People who currently trap will continue to trap for the pelts, but may now trap to try and sell the carcases. There is the possibility that people will spend all their money collecting food sources, than they might not have money left over to hunt and purchase bear or even other tags throughout the seasons.

Thank you,

Ethan Heyrend

Thank you,

Ethan Heyrend

Submitted Jan 13 2014 - 7:58pm



Negotiated Rulemaking - Bear Baiting Comments

Zach Keys

I think its a bad idea. Mainly because it's a platform to build on whether its intended that way or not. I grew up loving hound hunting and baiting in Oregon with my father. Just before I reached the age I could finally take a kill shot myself it was finally banned after whittling away at it for many years through regulations. I think the problem is that the Yellowstone grizzly bear has reached it population saturation maximum and that bears are going into residential areas because there isn't enough wilderness to support the population further, this theory has been substantiated by many biologists far more knowledgeable than I. I think offering a few grizzly tags a year in those areas would go a lot further towards limited unwanted interaction than banning baiting which is essentially what this is. No one I know would be able to pick enough berries, find enough road kill, or be able to store enough non game carcasses to make a sufficient bait for a season. This regulation seems more in line to please those who don't support wildlife than those that do (people who buy tags and licenses). I have several friends who bait those areas and have for many years with 0 grizzly encounters on their baits. I also worry that this may eventually extend to unit 67 where i bait. I could see if there was evidence to support the theory that baits increase unwanted interaction between people and Yellowstone grizzly bears but there isn't or at least hasn't been made available.

Submitted Jan 13 2014 - 9:11pm



Negotiated Rulemaking - Bear Baiting Comments

Brandon

Anyone who has hunted bears before knows that it is almost impossible to be successful at it without the aid of a bait or dogs. And even with these it is still not easy or guaranteed that you will even get one. I sure hope that you take into consideration the tens of thousands of Idahoans that buy bear tags every year as all of them being in favor of baiting, and you don't make new rules because of 20 complaints from out of state cabin owners that saw a bear by their house that they built in the middle of bear habitat. Do you honestly think that bear baiting out in the forest is drawing bears to cabins in other places? Do you really think that their dirty, greasy barbecues out on the deck, dog food and garbage bags left out side does nothing to bring bears in by themselves? I would really like to know how many of these complaints even came from within the areas where baiting is even allowed? Do you really think anyone has the time to spend months picking 40-50 gallons of berries for bait, just to be used up in one to two weeks of baiting? Or where exactly are we supposed to store 20-50 rotting fur-barer corpses for 5 months before the spring bear hunt begins? I guess the real question is; are you really willing to make, who knows how many, thousands of hunters hate you for ruining their chance to get a bear just because a few Out of Stater's encountered wildlife while they were in the wild? Please don't take more of our baiting opportunities away from us.

Submitted Jan 13 2014 - 10:37pm



Negotiated Rulemaking - Bear Baiting Comments

Kirt Ballard

I have baited in island park for the last five years off and on, and I can see where having a bait site close to campgrounds and cabins could pose a risk to people. I don't believe the type of bait used would have any impact on encounters with bears, bears seem to be garbage disposals they will take anything edible, granted sweets are preferred but any thing that smells will attract them. If home owners and campers don't take that into account then there will be problems by the time most people start camping in the island park area where we bait most bears have seemed to move on to greener areas. So in short I think the proposed rule change will do nothing to prevent problems.

Submitted Jan 14 2014 - 7:53am



Negotiated Rulemaking - Bear Baiting Comments

Mark Sherick

I do not support the proposed bear baiting changes for the Upper Snake/Island Park zone. This restriction is essentially one step away from eliminating baiting in this area altogether, and is not going to reduce human/bear interactions, nor will it acclimate the bears to human food sources. Until the growing bear population in this area is controlled, there will be increased contacts between humans and bears. Bears that are seeking human food sources will find it, as long as the bear population grows, and the number of people using the area steadily increases as well.

Do not continuously reduce the current hunting opportunities that sportsman enjoy and purchase licenses for.

Submitted Jan 14 2014 - 9:42am



Negotiated Rulemaking - Bear Baiting Comments

Jared Grover

I understand the concern in conditioning grizzly bears to non-natural foods - but I believe proximity laws would be better suited rather than a blanket sweep of barring non-natural baits. First - I note that there isn't any scientific data to support this concern. I can see the logic - but I would like to see documented studies attached to such a rule proposition rather than just "concern." With the long history of bear baiting in these occupied grizzle habitat areas, one would think this study would have been done long ago and relied upon when making new rules. Secondly, this rule is a dangerous precedent and a slippery slope. Many of the units I hunt in are designated as having the possibility of encountering a grizzly bear (i.e. GMUs 64, 66, 67) while the likelihood is extremely low comparatively. If the F&G commission states that grizzly bears may be encountered in these units, this law would pave the way for further bait regulation in these units despite a low grizzly population - all based on "concern." It seems apparent that this proposed regulation essentially makes baiting bears in these units unfeasible. Knowing this, it would follow that this is a reasonable back door approach to regulate baiting practices out of the realm of possibility in many GMUs - essentially rendering Idaho a non-baiting state. Baiting is a long held and cherished practice within our state, and without HARD scientific data to lean upon or a series of controls to define what "occupied grizzly habitat" is outside of the F&H commission just "saying so" I DO NOT support this rule.

Submitted Jan 14 2014 - 10:18am



Negotiated Rulemaking - Bear Baiting Comments

David E. Hart

As someone who resides north of Kilgore, ID, in the affected area, I strongly support this rule change. There was a time in the past when the population of Unit 61 from Howard Creek to I-15 was extremely sparse. Due to the increase in population not only in Idaho but specifically in the Rexburg, ID, area, this area is receiving much more in the way of use. During the summer and fall months when bear baiting is in effect campers, hikers, fishermen, and horseback riders utilize this entire area for recreation. I have observed a definite increase, especially in the amount of younger families, that camp and hike with their small children in this area. I believe that the Idaho Department of Fish and Game has clearly set forth in the Rules for Governing the Use of Bait and Trapping for Big Game Animals the basis and rationale for these bear baiting changes.

The only additional change regarding bear baiting in grizzly bear habitat that I would suggest is the distance that a bear bait is placed from campsites or roads. The current regulation requires that "no bait site may be located within one-half mile of any designated campground or picnic area, administrative site, or dwelling." In the areas which I have identified there are numerous campground areas that are being used by campers and hikers as well as hunters that are not "designated" campground areas but which are no less used constantly during the spring, summer and fall months. I suggest when making a rule change regarding bear baiting that you consider extending the one-half mile rule to include roads and undesignated campsites.

I appreciate the efforts being made by the Idaho Department of Fish and Game to address and rectify this issue before someone who is unfamiliar with wild animal habitat has the unfortunate experience of wandering into a bear bait site located near a campsite or road.

Submitted Jan 14 2014 - 11:26am



Negotiated Rulemaking - Bear Baiting Comments

Jerry Evans (by telephone)

(comments captured from phone conversation.) Expressed opposition to tone and language used in the proposal that portrays that baiting with use of human processed baits results in creation of nuisance bears is scientific fact when it is not. if bait is attractive to a bear, it will find it no matter whether it is natural or unnatural bait--whether it is in the mountains or at someone's cabin. A bear bait in the mountains isn't causing conflict problems at people's cabins in Island Park. If they have garbage out, the bears will find it regardless of whether they have ever encountered a bait.

Do not change current rules for bear baiting. If bear baiting becomes harder, fewer bears will be taken and then there will be more bears. If there are more bears, there will be more problems. There is no evidence of bear baiting causing nuisance problems.

Submitted Jan 14 2014 - 12:18pm



Negotiated Rulemaking - Bear Baiting Comments

Gerald Trubl (Jerry)

I don't believe this change is the fix against food conditioned bears. Only two months in the fall and two in the spring will not condition a bear nearly as much as full time residents with home smells, garbage, pets and their supplies; or the spring, summer and fall camping. These are long term and continuous where the baiting is a short period with a long brake until the next baiting season. The chance of a human/bear conflict is increasing because more people are using the outdoors and with increased bear numbers the bears will naturally look and roam farther. If this change is implemented how long before its increased to more area. Living, hunting and camping in the mountains comes with some risk and everyone needs to be safe and aware of the forests hazards. Baiting as it is now, in these areas, will probably help to eliminate a black bear that is already attracted to the smells. And how will you stop a grizzly from coming through the area when its already his home and with their numbers increasing their range will increase.

Submitted Jan 14 2014 - 3:18pm



Negotiated Rulemaking - Bear Baiting Comments

Clyde Waddell

That sounds like good idea if u can keep campers from taking deer and elk streak camping and no huckle berry surip that bears will b attracted 2 other than smelly dead live stock don't make much sense

Submitted Jan 14 2014 - 5:54pm



Negotiated Rulemaking - Bear Baiting Comments

Dick R Andersen

Find attached Letter in PDF format

Submitted Jan 14 2014 - 9:26pm



Negotiated Rulemaking - Bear Baiting Comments

travis rigby

The individual that wrote this has never baited bears. Think about this; how many skunks, beavers, nongame fish, and birds would it take to bait/feed a bear? Clearly, this is not an option to harvest a bear. Most people have jobs and don't have time to collect the listed items. I can see going away from processed goods ie oils, cooked goods, pastries, and artificial goods. BUT meat and animal waste should still be usable. Not too many people through a cow gut in their trash can. It all comes down to if you are shutting area down go with your plan, if you want people to reduce the numbers of bears in the area or enjoy hunting/time in the forest then you need to allow a realistic bait.

Submitted Jan 15 2014 - 8:25am



Negotiated Rulemaking - Bear Baiting Comments

Brandon

I would really like to know how many problems there have been with black bears and humans? and you know its not going to make any difference if you change the rules, because they will seek it out on there own!!!! so just leave the baiting rules alone, and as far as the grizzly goes, I have only seen one in the wild deep in the back country and never seen one at the bait site or any of my friends bait sites ether!! so just leave it alone eatable or none eatable food, a bear will sniff it out with or with out are help, so please just leave thinks alone as they are!

Submitted Jan 15 2014 - 8:11pm



Negotiated Rulemaking - Bear Baiting Comments

Billijo Beck

Dear Mr. Racheal,

I am concerned that any limitation to an already existing season or method could definitely lead to more restrictions statewide. Once you open the door. Which this Proposal definitely opens that door. My concern is the grizzly is not going anywhere so what is to happen when grizzlies show up to the Salmon/Challis area? Per this protocol being set are they going to close them to unnatural bait? Very dangerous time for IDFG as what happens now may dictate future rulemaking. Regardless of the type of bait you're still going to have a grizzly bear issue. These grizzlies are not going to just not show up on a bait because there are no doughnuts! The thought behind is to limit conditioning them to human foods, but if you look at areas in Idaho and wyoming were areas baiting is prohibited because of grizzlies you see a massive human bear conflict issue. Look at Island park and Cody Wy. areas. No baiting but still have large grizzly issues. The Bait isn't the Problem!! Also, If you look at old articles in Region 6 you can see a bigger issue of Supervisor Steve Schmidt and his issues with Bear baiting in itself. As a sportsmen I have a HUGE issue with that, as it endangers one of our Tools in our Tool box to legally harvest bears. Now, and for the future. I remember when the Anti hunting groups came after our bear hunting not to long ago. Sad to think it's coming from within this time.

There is a Trash issue, however that issue should be worked out with the USFS.

Again, I don't agree with anything that meddles with one of our tools to legally harvest black bears.

Submitted Jan 16 2014 - 10:26am



Negotiated Rulemaking - Bear Baiting Comments

Bob Foster

It would be highly advisable to have public discussions of this issue. I am an avid black bear hunter and completely understand what the Dept. is wanting to accomplish. If, however, there are restrictions on bear baits used in grizzly-occupied areas, is the Dept. going to impose similar restrictions for homeowners that dump garbage in the woods, drag their dead livestock onto public lands, and leave pet food out in areas of their property readily accessible to bears? This may not always be the case, but in my experience in Unit 65, bear baits are typically located deep enough into the woods that they do not pose a threat to public safety. The other question that might be asked is, "where are spring bear hunters going to obtain the 'natural bear bait' on the allowed list?"

Submitted Jan 16 2014 - 2:17pm



Negotiated Rulemaking - Bear Baiting Comments

Terry Jasper

I do not see any reason to change the existing rules. In this proposal I have not seen any instances cited that should lead to this rule change. I also have not seen any scientific studies cited that show that this rule change would produce the desired affect (i.e. less "problem bears"). I also worry that if Fish and Game changes the rules in these paticular units it would eventually lead to more strict baiting policies in other units with or without grizzly bears. Idaho has the best predator control model in the western United States and I would hate to see that change because of rules like the one proposed. Please dont ruin the great bear hunting Idaho has to offer. Thanks

Submitted Jan 16 2014 - 7:45pm



Negotiated Rulemaking - Bear Baiting Comments

joe

There are too many regulations already that are for "unit A" but not for "Unit B." It is already confusing enough with all the little rules Idaho has to regulate and minimize hunting opprotunities. Add natural bait to the regulations and allow it in ALL units and then for certain Grizzly habitat units make it "Natural bait only" or dont change anything. With all of the "fine print" rules Idaho has it is no wonder Idaho has the least amount of non-resident hunters of any Western big game state. Im also willing to bet that the number of resident hunters is on the decline other than the super hunts because they want to avoid all the rules that are turning Idaho into California

Submitted Jan 17 2014 - 1:27am



Negotiated Rulemaking - Bear Baiting Comments

Cindy Riegel

Dear Daryl-

Last spring I was riding my mountain bike with my 9 year old daughter outside of Victor, Idaho on a trail that parallels Teton Pass (Highway

33 in Idaho). This is well established and often busy mountain bike trail that is great for beginner riders. On our ride, my daughter and I came across a couple of young bear hunters who had parked on the Highway and hiked up to the trail (about 1/4 mile). We stopped to chat. They were caring large buckets and were on their way to replenish their bear bait station about 1/4 mile from the trail we were on. I am used to coming across hunters on my backcountry adventures and always have nice, cordial conversations. This was no different. These guys were doing what they learned from their parents and they were enjoying themselves. It's tradition. My daughter was learning how to ride a mountain bike from me. I get it. I did not judge their behavior. However, I did judge the IDFG for licensing and sanctioning their behavior.

As most residents of Teton County will tell you, times have changed here. There are both more people and more grizzly bears. Sightings of grizzly bears are becoming more and more common. Threats and attacks have happened. What I don't understand is why the IDFG is encouraging more? Bear baiting (especially near well travelled roads and trails) puts our community and the bears at greater risk of injury or death.

Bear baiting in Teton County is asking for human-bear conflicts. And besides it's unethical. I took Hunter Safety. I occasionally go hunting. My freezer is full of elk, deer, and moose (provide by family and friends). There is something that you learn about in Hunter Safety called "fair chase". Bear baiting is not fair chase.

So why is IDFG still allowing it to happen? I am going to wager a bet that the biologists and land managers know what is right, but the decision makers are stalling. They are afraid to mess with tradition, their friends, or other influential people in their lives. Maybe they hunt with bear bait themselves. My plea is that they make a professional decision not a personal one in the name of public health and safety. I would hate for a 9 year old girl to get attacked by a grizzly bear who was drawn to a well travelled trail by a IDFG sanctioned bear bait. Additionally, I would hate for a good bear to be euthanized or hit by a car because they were baited into an area with heavy human use.

Please do the right thing for our community and for the bears. Stop bear baiting in Teton Basin.

Thanks, Cindy Riegel Victor, idaho

Submitted Jan 17 2014 - 7:15am



Negotiated Rulemaking - Bear Baiting Comments

brad gardner

I am opposed to this rule. Its allready hard enough to hunt bears. It takes a lot of hard work time and money to bear bait legally. Now its going to be even more restrictive? I don't believe there is any hard proof or examples of grizzly bears in idaho getting use to human food and causing nuisance problems. Where is the science on this issue? I spoke with a fish and game employee on this issue and it seemed to me he was more concerned of the conflict between federal rules on food storage in bear areas and the ability to violate those rules by obtaining a bait permit. He mentioned not allowing baiting or hound hunting and restricting the unit even further by making it a controlled hunt for trophy bears. It seemed to me this is more about collecting controlled hunt fees than actually dealing with a real issue. Again fish and game is pushing their own agenda versus maintaining or enhancing hunter opportunity and success.

Submitted Jan 17 2014 - 9:06am



Negotiated Rulemaking - Bear Baiting Comments

William Eckerle

I previously submitted a comment in support of the proposed rule change limiting baiting to natural foods. My reason for supporting was for increase public safety. However, now that I have put more thought into this issue I would like to expand my comments.

- 1) What is the science behind this rule change?
- 2) The Bridger-Teton National forest has a rule stating that all attractants must be properly stored between March 1 and December 1. What is the science behind why do bear baiters not have to comply with this?
- 3) All attractants must be properly stored between March 1 and December 1. What is the science behind why do bear baiters not have to comply with this? Food conditioning means access to human placed food, no matter if the food occurs naturally or not. Once a bear associates unnaturally abundant food with human scent the connection is made resulting in a food conditioned and potentially dangerous bear.
- 4) Both Teton County, ID and Teton County, WY have residential and commercial trash storage requirements in their bear management areas as a public safety measure. Why should bear baiters not be subject to similar restrictions? What is the science behind this?
- 6) To me it seems a good trade to extend the bear hunting season in the propose hunt areas but to ban baiting outright.
- 7) There does not seem to be any science suggesting that bear baiting in grizzly country is NOT a public health hazard!
- 8) Remember, families with children live at the Forest-valley interface in Teton Valley. These families do not need bears (grizzly and black) that are food conditioned by bear baiters.

Thanks for considering these comments,

Submitted Jan 17 2014 - 9:43am



Negotiated Rulemaking - Bear Baiting Comments

Var Harris

opposed to proposed regulation change required use of only natural baits.

will be too hard for bear baiters to find enough natural baits to run their baits with road kill. Most bear baiters are conscientous enough to not bait black bears where they might encounter grizzlies. Plus, grizzlies are more attracted to meat and not as interested in junk food so may be more likely to come into to road kill.

Primarily concerned that because it will be difficult to run a bait off of road kill, that some bear hunters will turn to poaching game animals to use for their bear baits.

Comments taken by telephone 1/17/2014 from Var Harris, Idaho Falls

Submitted Jan 17 2014 - 10:22am



Negotiated Rulemaking - Bear Baiting Comments

Joe Kondelis

Speaking for Yellowstone Country Bear Hunters Association we feel the only natural bait approach is the wrong way to go about stricter bear baiting regulations in grizzly country. These restrictions will limit sportsman opportunity and will not keep grizzly bears out of bait sites. If any attractant food or scent related will bring grizzly bears to bait sites. Beaver Castor is a prime example of a natural attractant that is as effective on black bears as grizzlies and is natural. There has been little work done by those behind this proposal to actually come up with a realistic solution to their perceived problem.

We have outlined several concerns and ideas for a more effective way to help manage conflict and grizzly bears in black bear baits. Please see attached document

Submitted Jan 17 2014 - 11:07am



Negotiated Rulemaking - Bear Baiting Comments

Terry Jasper

I am against changing the bear baiting from the current way it is done. There is no scientific evidence to make these changes.

Submitted Jan 17 2014 - 1:04pm



Negotiated Rulemaking - Bear Baiting Comments

Dave Frerichs

In response to the Idaho Department of fish and game letter dated January 7,2014 (Bear bait Permit Holders). I note the initial words in the proposed changes are very suggestive and open ended to push Bear Baiting in all units to "natural bait". Three-quaters of the way into the letter it appears to be more limiting toward units 60, 61, and 65. I am opposed to a California stile of legislation get your foot in the door and hunting as we know it today changes forever, it appears that your decisions have already been made relating to "public safety concerns". If negotiated rulemaking actions are for/with public comment and required by law, it appeared that your letter was sent to a limited persons (Bear Bait Permit Holders) rather than the public audience (All Idaho Residences) required by Law.

Submitted Jan 17 2014 - 4:08pm



Negotiated Rulemaking - Bear Baiting Comments

Weston Horne

As a land owner in Kilgore, Clark county, Idaho I see no problem with the Bear Baiting law as it is written. I think it is about time for a limited number of Grizzly bear tags to be issued. Help the Idaho Fish and Game with more income and controll any bear problems.

Submitted Jan 17 2014 - 5:37pm



Negotiated Rulemaking - Bear Baiting Comments

Greg Browne

This propose rule change makes no sense. The bears that are hunted over bait are not conditioned to be around people they are even more wary and secretive when they are hunted heavily and that is what baiting allows. There is no senseable reason to farther restrict Black Bear hunting and that includes baiting, which is a very valuable and much needed management tool in Idaho. We should not farther restrict our ability to manage our Black Bears.

Submitted Jan 17 2014 - 9:55pm



Negotiated Rulemaking - Bear Baiting Comments

Nick Hopkins

Jon Rachael,

This bear baiting proposal in my opinion will not work the way planned if i understand it correctly. The natural foods will not reduce grizzly activity, grizzlies are attracted to food by instinct wether its natural or not. In my opinion what will happen is less baiting for black bears which will cause the black bear population to rise which will cause more competition for food. This means searching out camping food, hikers, calves, fawns and livestock. More predators sure makes it harder to manage big game populations.

What would help more than anything and has been proved time after time is a controlled grizzly hunt. Make those animals aware that when they see human they need to scatter. This will help reduce population of grizzly, keep more baiting in those areas to manage black bear populations and also educate the grizz that humans mean danger. They are becoming so confident and so un bothered they are becoming brave.

I am completely against this proposal and believe it will not do anything but make the problem worse.

Thanks for your time

Nick Hopkins Chubbuck Id

Submitted Jan 18 2014 - 7:13am



Negotiated Rulemaking - Bear Baiting Comments

Neff

Sorry I think we should be focusing on REAL issues in our "conservation" projects. Such as our dwendelling numbers of our elk, mule deer and moose! Not if a bear bait is composed of "natural" or "processed" baits. And besides everyone knows that you guys don't have the man power to enforce your rules you have in place now, look at your rules for no 4-wheelers.

Submitted Jan 18 2014 - 9:47am



Negotiated Rulemaking - Bear Baiting Comments

Gary Thomas

Idaho Hunters and Trappers are not stupid. We know the risks and accept them by our own free will. The danger, real or imagined, is part of the fun of bear hunting. Don't try to protect us, we don't need or want it. Your rules about bear bait near dumps,camp grounds and homes is enough and understandable. We don't need any changes.

Submitted Jan 18 2014 - 10:22am



Negotiated Rulemaking - Bear Baiting Comments

Larry velvick

I see no need to change the bear baiting rules currently in place. They appear to be working. If it ain't broke don't fix it!

Submitted Jan 18 2014 - 10:45am



Negotiated Rulemaking - Bear Baiting Comments

Corey Hopkins

Just leave the rules the way they already exist!

Submitted Jan 18 2014 - 10:59am



Negotiated Rulemaking - Bear Baiting Comments

Varinia Foster

My family and I have been active in bear baiting for many years. What I have come to find is bears do not want any activity with humans. What drives bears is there appetite. As long as we are able to feed the bears we are actually providing a happy environment. The bears appetite is dissolved and it helps us to harvest a certain percentage of the population. Baiting allows us to use food that would otherwise be thrown away for a good use. Economically trying to find bait that is all natural is going to dissuade a lot of people. Which is going to cause hungry bears and ultimately a higher bear population. This will cause more bears seaking food in wrong places which actually increases the problem your trying to prevent. I think for the most part the system were now using is working great. What needs to happen is for us to start managing problem grizzly areas with controlled tags. This will provide more revenue less problem bears and more opportunities for Idaho hunters!

Submitted Jan 18 2014 - 11:53am



Negotiated Rulemaking - Bear Baiting Comments

Tucker roseman

What happens when you take away a food source? Another is found and it won't be all berries and grass my friends. Look at what is already happening to big game herds due to predators this will just make it worse. And the problem bear numbers will just go up because they are looking for other food sources.you have rules in place for campsite and water sources and roads . If something is not broken don't try to fix it.

Submitted Jan 18 2014 - 12:51pm



Negotiated Rulemaking - Bear Baiting Comments

Jason Dlouhy

This is essentially smacking the right arm to make the left quit hurting. Decreasing the effectiveness of bear hunters means less success and, therefore, more problem bears.

Submitted Jan 18 2014 - 2:02pm



Negotiated Rulemaking - Bear Baiting Comments

Dan Hoopes

I do not currently hunt bears. But I have four boys that are up and coming hunters that want to hunt bears. I do not want to see this go away.

Thanks

Dan Hoopes

Submitted Jan 18 2014 - 4:23pm



Negotiated Rulemaking - Bear Baiting Comments

Frank Webber

I do not support the closing of bear baiting in the Island Park area. IDFG needs to address the real bear problem and control the grizzly population. If you really cared about wildlife in the state Idaho would take an aggressive stand against the grizzly population by forcing a delisting of the grizzly in Island Park and start a hunting season immediately. IDFG is losing archery hunters at a significant rate in Island Park because of the number of close calls and sightings we have. It is pretty bad when you should carry a 338 with you along with your bow. Do the right thing and address the grizzly problem by killing a few and the baiting issue will take care of itself

Submitted Jan 18 2014 - 5:01pm



Negotiated Rulemaking - Bear Baiting Comments

Jeremy Snell

I don't agree with this rule. I think this is too restrictive and there is not enough evidence to make the assumption that using other forms of bait turns a bear into a nuisance bear. Leave it alone. Baiting bears is difficult and expensive enough as it is enough as it is. Hunters don't need the agency to make rules based on assumptions.

Submitted Jan 18 2014 - 7:28pm



Negotiated Rulemaking - Bear Baiting Comments

Blaine Hone

I oppose this rule. The idea that baiting bears that are ultimately taken as part of a hunt somehow conditions other bears to pose some kind of threat to people doesn't make any sense. I would be very interested to see whatever science on which this proposed rule is based. My guess it is very suspect. This is a restrictive and non beneficial rule. I don't even hunt in this area. I just think unnecessary restriction is a disappointing effort that is all too common for F and G.

Submitted Jan 18 2014 - 7:59pm



Negotiated Rulemaking - Bear Baiting Comments

Darrus Martin

This is a non-issue bears will find food by their nose. If they smell a Twinkie they know it is good to eat. No one has to teach a bear Twinkies or doughnuts are good to eat. If it smells good they eat it. Actually baits keep bears away from campgrounds and cabins. August is the month the department has the most problems with bears. August is the month we are not allowed to bait. At this time you are proposing this in the Island Park area, but I am sure this will expand to other areas as Grizzles move into mew areas or someone spots a Griz, in Heise, Palisades or Driggs.

Submitted Jan 18 2014 - 8:40pm



Negotiated Rulemaking - Bear Baiting Comments

Jakeb maupin

I would like to see the rules stay the same as they are now, no change in the way we bait in grizzly units. My thoughts are if a grizzly bear is hungry he well go into a campground and eat whatever he wants regardless if he had eaten processed food out of a bear bait.

Submitted Jan 18 2014 - 9:06pm



Negotiated Rulemaking - Bear Baiting Comments

shawn sayer

I Do Not Agree With This Restrictive Policy Change For Baiting Bears In The Areas Suggested. I Do Not Believe This Change Is Either Necessary Or Effective In AddressinG potential Human/Bear Conflict.Rather, As Discussed In de-listing Proposals, The Grizzly Bears Themselves Must Be Hunted On A Limited Basis In The Near Future To Limit Both Western Migration From Island Park To Spencer, Spencer To Med Lodge, Med lodge And Beyond.

Submitted Jan 18 2014 - 10:08pm



Negotiated Rulemaking - Bear Baiting Comments

Phil Cogley

Please leave baiting the way it is. I moved from Washington so I could bait bears here in Idaho. thanks

Submitted Jan 19 2014 - 4:25am



Negotiated Rulemaking - Bear Baiting Comments

Tim ozburn

I strongly disagree. Wild bears come to anything this will have no effect on problem bear but to over populate the area. Where is the science behind this. This is only someone's idea. You make one chance then this will expand to other zones because there our more bears from lack of hunters hunting in these zones being affected. When these bears run out of there food because of over population where our they going to look? Campers, hikers, houses and so on.

Submitted Jan 19 2014 - 4:29am



Negotiated Rulemaking - Bear Baiting Comments

Bruce Smithhammer

Dear Regional Wildlife Managers -

I would like to comment on the proposed changes to black bear baiting practices in grizzly country. First off, I am an avid hunter, and in 2013, I hunted Zone 65 for black bear (one of the zones in question), and had numerous opportunities though I did not take a bear. I did not use bait. My concerns about the proposed changes are:

- These proposed changes will be very easy to get around by simply pre-mixing bait slurry prior to arrival at hunting grounds, as many bear hunters who use bait already do. All I see these changes doing is encouraging people to mix their slurries extra-well, if they plan to continue to include food items that would no longer permitted.
- As a result of the above, I also foresee significant hurdles, if not impossibilities, when it comes to enforcement of these changes in the field. How, for example, are the often indeterminate contents of a mashed-up bait slurry going to be detected and diagnosed at the trailhead?
- If this is truly being driven by safety concerns, then why are items such as non-edible parts of game animals/fish and legally-salvaged roadkill, both of which are not currently allowed, being added to the list of approved items? How is this increasing safety?
- Why is it, for example that baiting is not allowed in Zone 62, but is allowed in neighboring Zone 65, both of which harbor grizzlies? What is the science and rationale behind this, and why are they not consistent?
- Allowing bait in grizzly zones is contradictory and at odds with the regulations that other backcountry user groups are expected to comply with. Why is it that if I go backpacking in the Tetons and don't properly store my food in a bear canister, I will face serious penalties, but it's perfectly legal for me to put out large amounts of bear-attracting bait in the very same location?
- If IDF&G feels that this is truly a safety issue that needs to be addressed (as they have stated, and I agree), then there is really only one decision to be made that will have any appreciable effect on increasing safety eliminate baiting in grizzly zones. Make all black bear hunting in these zones 'spot and stalk' only which, at the end of the day, would only affect a very small part of the state. To address anticipated complaints about opportunities being diminished, I would suggest also lengthening seasons in all of these zones (to June 30th across the board for spring seasons, for example). This will provide a longer opportunity for bear hunters, while effectively addressing real safety concerns in a way that simply changing the contents of a bait barrel will not.

Thank you for taking the time to read this, Bruce Smithhammer 9029 Red Mountain Way Victor, ID 83455 208.201.5231

Submitted Jan 19 2014 - 7:34am



Negotiated Rulemaking - Bear Baiting Comments

kade knox

This is completely senseless

Submitted Jan 19 2014 - 8:46am



Negotiated Rulemaking - Bear Baiting Comments

Shawn Fraser

I don't believe in the rule changes also do not believe in the current rule of having to skin a animal if used for bait. If a animal dies naturally in the woods and is consumed; there is no removing of the hide, and as such is a natural occurrence. Outlawing the use of animals in the units being proposed also doesn't make sense; as animals are a natural food source regardless of how it got there. Rather it arrived naturally or placed by a hunter; the bear knows no difference, and as such only sees it as a food source. Having to use only berries and roots is pretty much a way of shutting down the bear baiting in those areas, without actually coming out and saying the area is closed to bear baiting. Trying to retrieve berries and roots; not only would not be efficient nor cost effective for the hunter, and as it was no longer baited and hunted. Then would lead to more bear problems as the numbers increase; due to the lack of controlling the population. I would say it is safe to say that the number would go from the 50 down to 5 at the most. It has hard enough to acquire bait as it is at any frequency and be able to maintain it over the course of the year. As the amount bear baiters go down; that are keeping the bears in the mountains during baiting season, then the number of bear encounters are going to go up due to lack of food source. The last few years thanks to weather conditions; the berries and natural food sources that the bears rely on have not been available and therefore we have probably lost several bears due to that, plus the food that we have provided has maintained a healthy population.

Submitted Jan 19 2014 - 2:08pm



Negotiated Rulemaking - Bear Baiting Comments

Tristin fa

I am really not happy with the changing of bear bait rules. I am not like most. Most people see things one sided, but I try to take a step back and look at things how they really are, I try to stand for what is actually right, not what I want to be right. I don't understand how we could let the rules be influenced by those who not an active part in this. I understand that people are worried about having bears around their cabins and families, I don't understand why you would build a cabin right in the middle of bear country and then complain about having bears around. I can see that they feel we are bringing bears into cabins, however with our experiences in which we have actually had bears come to our cabins, is that bears come into cabins no matter what. We had more bears at cabins that were in areas that you couldn't bait than in areas where you could bait. So if anything it helps keep the bear problem down to have us feed them. Also I don't feel it that everything will be changed because of some complaints made by people that live out of state, but that own cabins In the area. We are paying license and tag fees, and they don't. Yes a few May pay out of state fees, but they probably aren't complaining. Also you need as much money as you can get to run your department. I feel if it is changed to a natural bait then we shouldn't have to get a bait tag. If we don't buy bait tags then you make less money. I also feel that this is just a way to slowly manipulate and change to eventually not letting us bait at all. Also we will not be as successful using a "natural" bait which in turn there will be more bears so you will have a bigger problem. I hate to say it but I feel this situation is one sided and it shouldn't be like that. I love hunting and I hate to see our rights taken away. If it is changed I will go somewhere else to hunt. I love hunting bears so I would be more than wiling to go out of state. I will buy tags and license there not here. I am glad you give us this opportunity to. Life how we feel, because we Are out there in the field we see what happens. I have pictures from our game cameras with tons of bears. I really feel that if this is changed you will have a problem with too many bears.

Submitted Jan 19 2014 - 5:56pm



Negotiated Rulemaking - Bear Baiting Comments

Bruce Cooper

I am not for this change. This will open bear up baiting restrictions to all species of bear. I do not believe it will make any difference to the Grizzly bear if it is natural occurring food or not. If they smell something that peaks their interest, they will check it out to satisfy their curiosity, as well as their hunger.

Submitted Jan 19 2014 - 6:31pm



Negotiated Rulemaking - Bear Baiting Comments

jeff ames

The issue isn't the bait used. The issue is the increase of grizzly bears. work on grizzly bear management. thats the real issue here. Restricted bait is pointless.

Submitted Jan 19 2014 - 7:24pm



Negotiated Rulemaking - Bear Baiting Comments

Tyson Murphy

I will support no person voting on closing the baiting rule for black bear. Its a great management tool for hunting them. It gives a person the chance to judge size, gender, and whether or not there are cubs in the area. Leave the baiting rule intact.

Submitted Jan 19 2014 - 7:35pm



Negotiated Rulemaking - Bear Baiting Comments

Brent Conan

Do not restrict bear baiting!

Submitted Jan 19 2014 - 8:30pm



Negotiated Rulemaking - Bear Baiting Comments

Larry Tillinghast

I do not support elimination of non-natural bait sights in Unit 60, 61 and 65. We have not been shown positive evidence that this will bring any benefit. I am all for managing our wildlife for the best. The best life for the animals, and the best hunting opportunity. Please do not follow through with this new rule.

Submitted Jan 19 2014 - 10:32pm



Negotiated Rulemaking - Bear Baiting Comments

Ian Chestnut

I am completely against the new proposed regulations on black bear baiting. I also believe that the background information supporting this rule change is inadequate to support any change to the current regulations. If a rule change is proposed, I would expect that the background information include incidents that have recently occurred prompting the rule change and a scientific study (not a politically driven change) supporting the changes for the rule change. I believe these new regulations will no effect the grizzly/human encounters. Most of the incidents that are reasonably accessible concerning grizzly/human encounters have been elk hunters in these units, not bear hunters or grizzly bears coming into human food sources. This rule is unnecessarily restrictive. There are plenty of bait sources that could be used that primarily attract black bears and could still be used for sportsman to allow hunting opportunity for black bears in these units. I also do not believe the statement that this rule change only effects 50 sportsman is accurate or founded on data in any way. I have bought black bear baiting permits for over ten years in this state and have never been asked one time if I bait in these units. I personally know of over 40 people who this regulation would effect. If the current regulations need to be changed to address an actual problem, not a false sense of a problem brought on by political pressure, I would expect that the decisions be founded on studies, science and actual solutions to the problem instead of inaccurate and incomplete information. I believe our Fish and Game resources should be spent on the actual problem which is how to effectively manage the growing grizzly bear population instead of restricting hunting opportunity for the sportsman it is intended to serve.

Submitted Jan 19 2014 - 10:38pm



Negotiated Rulemaking - Bear Baiting Comments

Mark Chandler

I have 11 different grizzly bear pics in one spring hunt in unit 60. Lets bait all of Island Park with the new rules, grizzly are many area wide so what the heck.

Submitted Jan 20 2014 - 6:26am



Negotiated Rulemaking - Bear Baiting Comments

RON JEANBLANC

I hunters should be able to use baiting as a means to harvest a bear.

Submitted Jan 20 2014 - 7:55am



Negotiated Rulemaking - Bear Baiting Comments

RON JEANBLANC

I believe hunters should be able to use baiting as a means to harvest a bear.

Submitted Jan 20 2014 - 7:55am



Negotiated Rulemaking - Bear Baiting Comments

Eric Reed

I appreciate the opportunity to provide my thoughts. I am not in favor of the proposed change. I feel that allowing portions of game animals to be used as bait will increase the motivation of poachers who are desperate to find natural bait. In addition, I think many ethical hunters would struggle to find natural bait in sufficient quantities for baiting and as a result would not bait in the specified units. The lack of bear baiting in those units could result in higher bear populations and consequently more bear/human encounters.

Submitted Jan 20 2014 - 8:05am



Negotiated Rulemaking - Bear Baiting Comments

Ryan Murdock

I think the change in the baiting rules is a good idea. I bait bears and know that hunters in that area will not be happy. But somehting has to give. Human safety should always come first, even over government costs. Along with that if there is an over abundance of grizzly bears in the area a draw the government should kill bears in the area with in a certain distance on site. Black bears also not just Grizzlys. One bear that is curious or has been fed before will always come back unless it is killed. If money is a concearn which it always is coming back for the same problem bear over and over will cost alot more than eliminating the problem from the begining. Something obviously needs to be done. The bears that are killed by officers could be sold at the annual auction to generate money for the time spent from the bears killed and could help with the problematic bear maintenace cost. You also could generate more money and have the hunters thin out the area by saleing two tags in certain problematic areas. I am not familiar with area being affected. But issuing a two tag option in areas with a high number of problems and the new baiting rules could cut down on costs all over the state. If there is a big unit that a problematic area is in create a smaller area around these sites and make them a two tag option and incourage hunters to harvest bears. I don't know how you could regulate it but even a small bounty in that area could be alot cheaper than an officers wage, gas, vehicles, etc. Or even the second tag for a couple years could be at no cost. Just some ideas. Maybe one may help. Have a good day.-Ryan



Negotiated Rulemaking - Bear Baiting Comments

Casey

This will not work! And will only cause less baiting which will expand black bear and grizzly populations which will increase competition for food which leaves our big game, calves, fawns, and campers, hikers at a higher risk! Please leave it alone.

Submitted Jan 20 2014 - 10:21am



Negotiated Rulemaking - Bear Baiting Comments

Jared Golding

Hello Jon,

I think it's a bad idea. I don't see how this rule will do anything to change bear encounters. It will not matter if the bait is processed or not. Bear encounters will increase until they are managed through hunting. A hungry brown bear will investigate the smell of meat whether it has been processed or not. It will smell meat. By changing the baiting rules to exclude baits like these only takes away from lawful baiters.

Basically it's never been an issue with black bears, at least not that I've heard of. So the theory of processed foods being the issue, would make it completely unsafe to have a picnic in the majority of Idaho or risk attack from Black Bears. Maybe if a controlled hunt on grizzlies opened, they would learn to fear man and this wouldn't be an issue either. I hope the FIsh & Game will rule on the fact there is no need to further restrict baiters and instead address the increasing Grizzly population. Most of the interactions I hear of are due to ignorant "city dwellers" who have no business in bear country. They are slobs and do not keep a clean camp. I hope there will be more enforcement on keeping clean camps to address the perps and less restrictions on lawful sportsmen.

Regards,

Jared Golding

Submitted Jan 20 2014 - 10:29am



Negotiated Rulemaking - Bear Baiting Comments

Jeff Thomas

Yep, just keep taking more from the hunters and charging more for us to do what we love to do. I am tired of the things that happen in this state involving hunting and fishing. Let's start with getting rid of ALL of the wolves and then maybe nonresident sales will go up again. Who wants to spend big money to come to Idaho to hunt when we have a severe decline in our elk and deer herds? If the sales go up with the TOTAL eradication of the wolves that we don't want forced on us, then maybe Fish and Game would have the money to deal with the bear problems without taking from the hunters that support this state every year. I am against putting more restrictions on bear baiting. It offers a great way to judge the size of the bears before you shoot them. Just using natural bait will make it much harder to get a bear. You guys are wanting the hunters to take more predators, but want to further restrict how we can take them? You make no sense to me. This proposal doesn't effect where I hunt, but the way things go, I'm sure it will soon enough. This state is so far behind the times on archery, it's not funny. I don't understand why using a lighted nock is a bad thing. Arrow recovery and being able to see where you hit the animal is a plus, you guys call it a crime. I would like to see some heads pulled out of butts and for you guys to start using your heads to figure out how to get more people to hunt our beautiful state, instead of ways to keep people from wanting to come here and spend their money supporting all of us involved in fishing and hunting statewide.

Submitted Jan 20 2014 - 11:41am



Negotiated Rulemaking - Bear Baiting Comments

Eddie Niehay

I just want to make it clear that I am opposed to the baiting restrictions proposed!!

Submitted Jan 20 2014 - 12:14pm



Negotiated Rulemaking - Bear Baiting Comments

jason byington

if the proposed rule change goes into affect, are you (fish and game) to have some places for the public hunter to get natural bait, etc. I can see the ban of sweet breads and grains for this. there are some syntheics out there that can do the same as natural baits can without the human food subsitue

Submitted Jan 20 2014 - 12:24pm



Negotiated Rulemaking - Bear Baiting Comments

GREG PUFFE

please do not change any thing and open wolf season while we are baiting///

Submitted Jan 20 2014 - 12:32pm



Negotiated Rulemaking - Bear Baiting Comments

kelly Lupton

Please leave it alone..

Submitted Jan 20 2014 - 1:09pm



Negotiated Rulemaking - Bear Baiting Comments

Randy Mead

In the Island Park zone the Grizzly Bear population is growing at an alarming rate. Each year I hear of more and more human/grizzly encounters with some resulting in an attack. So far I don't believe there have been any fatalities from these attacks, but in my opinion it is merely a matter of time. Add this increase in grizzly population with the huge growth in wolf population in the area along with the black bears and mountain lions, the Elk, deer and Moose populations are going to continue to decline at an alarming rate. Managing all predators is key to slowing down this decline. So if bear baiting is changed to natural baits only, many hunters will stop hunting black bears in the Island Park zone. Which in turn results in an increase in black bear population which further complicates the predator issue. I personally don't bear bait, but I know several people that do. They are ones that won't bear bait with natural baits only if implemented because the natural baits are a very limited supply and can be very expensive. I don't know what the answer is and I don't know all of the facts are about bears being trained to human food consumption. But logic tells me if a bear smells food, regardless of what it is natural or otherwise, they will go for the easy meal. So I don't think there is training involved and that it's more of a predators instinct to survive with as little effort as possible. I feel like the bear baiting should remain as is in the proposed areas for change and that more focus should be on how we manage predators, grizzly bears specifically. Sooner or later the grizzly/human encounters are going to be a normal occurrence. So if management of those predators doesn't begin now, like I said, it is merely a matter of time before there is a fatality from a grizzly attack. So whether or not bear baiting is done with human food or natural foods the underlying problem is not being addressed. Start there and be bold and then you will be on the right path. Sitting back waiting for the inevitable solves nothing.

Submitted Jan 20 2014 - 1:53pm



Negotiated Rulemaking - Bear Baiting Comments

Karen Brown

I do not feel there should be any limitations or restrictions put on the current bear baiting laws in Idaho. We see bears every time we are in Island Park, which is very often. The bear baiting is in no way harming the current bear population. The last thing our hunting needs is more restriction.

Submitted Jan 20 2014 - 2:46pm



Negotiated Rulemaking - Bear Baiting Comments

eli lankford

If it is not a major problem already then don't change it. It would be like shutting down a road because you think people might speed. Wait until their is incidence that justify the change. In the island park area it is already difficult enough to bear bait with the hound hunting. Also, as the grizzly extend their habitat, this will continue to put limitations on more and more hunting areas.

Submitted Jan 20 2014 - 2:47pm



Negotiated Rulemaking - Bear Baiting Comments

Brennae Brown

Please do not change anything about the bear baiting laws in Idaho. We see bears all the time. Their numbers are not few or in danger. We do not need more restrictions.

Submitted Jan 20 2014 - 2:49pm



Negotiated Rulemaking - Bear Baiting Comments

K. L. Brown

Do not take away our bear baiting rights! The bears are not endangered or their numbers few. We are always seeing bears. If anything you should add the right to kill bait and kill Grizzlies, because they are everywhere too. The last thing we need are more hunting restrictions.

Submitted Jan 20 2014 - 2:52pm



Negotiated Rulemaking - Bear Baiting Comments

Shaylee Brown

Do not limit or restrict our bear baiting laws. The bear numbers are not low or endangered. We do not need more restrictions. We are always seeing bears.

Submitted Jan 20 2014 - 2:55pm



Negotiated Rulemaking - Bear Baiting Comments

Shaylee Brown

Do not make changes to our bear baiting laws. We are always seeing bears in Island Park. Their numbers are not few. You really should include grizzlies instead of making any restrictions. There are tons of grizzlies and hunting would be good for their population.

Submitted Jan 20 2014 - 2:59pm



Negotiated Rulemaking - Bear Baiting Comments

Halee brown

Do not make any changes or restrictions to our bear baiting. Add grizzlies instead of taking baiting away. We see tons of bears in the mountains. The last thing we need are more restrictions.

Submitted Jan 20 2014 - 3:01pm



Negotiated Rulemaking - Bear Baiting Comments

Heather Sharp

I would like to comment that I do not agree with making bear baiting be with natural bait only. That would be basically impossible. It seems like just a way to stop most people from baiting bears. My family has had a cabin in Island Park for 30 years and we uderstand that if you build where bears live that you will see bears near your home sometimes. I want baiting to continue as it is now. It seems it should be opened in the rest of Island Park too so there can be more bears shot in those areas where it is currently not allowed.

Submitted Jan 20 2014 - 3:25pm



Negotiated Rulemaking - Bear Baiting Comments

Rob Dlas

I have been hunting a number of years and hardly seen a bear I can only imagine how hard it would be to get a bear in this manner I would vote against doing such a thing thanks Rob

Submitted Jan 20 2014 - 3:32pm



Negotiated Rulemaking - Bear Baiting Comments

Jeff Webb

I don't want bear baiting changed at all. I think the use of human food is necessary to be able to truly bait bears. Nobody except for a professional trapper is going to have enough predator or furbearer carcases to run a successful bait. This seems like an attempt to just prevent nearly everybody from baiting bears. We have so many bears in Island Park area that it is rediculous. Stopping baiting will just cause more bears. Look at your own records, aren't most bears in the area killed off baites? All this will do is create more bears to come harass people at their cabins. How about we open up the section of Island Park to baiting that is closed so we can start reducing them a little in that area? I see more bears just driving down the highway in Island Park then I ever have in the past. I don't see how limiting the hunters would ever be a solution to bear problems. If you are having too many bear-human encounters then kill more bears, don't limit the hunters.

Submitted Jan 20 2014 - 3:37pm



Negotiated Rulemaking - Bear Baiting Comments

Jared Sharp

I really hope that the bear baiting does not get changed. The use of human food is a very effective way to take bears. To use natural bait as you suggest would be nearly impossible for most hunters. We don't have access to a stack of predator carcases. Roots and berries is truly rediculous. Is the truth that you just want to stop baiting, because that is what this move would accomplish? There is a very healthy bear population in the Island Park area, and I hope to keep the baiting the same so we can control them a little. Don't your records show that the majority of bears are killed because of baits in the Island Park area? Please leave this how it is.

Submitted Jan 20 2014 - 3:48pm



Negotiated Rulemaking - Bear Baiting Comments

Michael Blach

Baiting for bears is one of the best management tools you have. It allows the hunter to observe for gender and maturity. It allows the hunter ample time to make sure there are no cubs. It probably makes bear hunting more successful which gives younger hunters a better chance to harvest an animal. Anything we can do to encourage the next generation is important. Plus sitting in a stand out in the woods is a unique and awsome experience. I have had quite a few baits out over the years but have only taken a couple of bears. Baiting bears allows me to be selective to only take an appropriate animal. My children have had the opportunity to experience bears in the wild because of baiting. Looking at bears in the wild is different than looking at bears at the zoo. Please keep this management tool available to the hunters of Idaho.

Submitted Jan 20 2014 - 4:03pm



Negotiated Rulemaking - Bear Baiting Comments

Robert B Nash III

Hello, I am Robert Nash. I am writing in response to the preposed changes in bear baiting rules. I do not belive the changes that are up for consideration will result in a reduction in nuisance bears. In fact I feel you will see an increase in nuisance bears as a result of gonig to natural baits only. I can say with a fair amount of certainty not a single top predator in Mackay, ID wants anything to do with a frozen skunk butt. More over requiring hunters to only use such baits and sockplie a two month supply is unreasonable at best. I have not seen nor do I think I will ever see a grizzly bear in the central mountains. If you chose to go forward with these proposed rule changes I will not be purchasing a bear baiting license or bear tag this or any other year. As I would think my chances of harvesting an animal with natural bait are zero. Out of state hunters will be discouraged as well because who really wants to haul natural bait from another state to go hunting. After a few seasons of very few hunters hunting bears because of these proposed changes the nuisance bear problem may well increase. Thank You.

Submitted Jan 20 2014 - 5:38pm



Negotiated Rulemaking - Bear Baiting Comments

Ben Rydalch

I think there is no benefit to changing the baiting program to natural bait only. Many areas of Island Park are not open to baiting currently. What is the percent of complaints associated with bears from the non baiting areas vs the baiting areas?? In some of the baiting areas many new cabins have been built where bears would pass through to get water....bears are not getting closer to cabins because of bait. I think bear baiting is reasonable and helps control the bear population and is not the problem associated to bear complaints by cabin owners.

Submitted Jan 20 2014 - 5:50pm



Negotiated Rulemaking - Bear Baiting Comments

Dallas Brown

Do not change bear baiting. If you change it only a select few people will be able to bait bears. If anything needs to be done with bears we need to start hunting grizzly bears.

Submitted Jan 20 2014 - 6:55pm



Negotiated Rulemaking - Bear Baiting Comments

Justin Jordan

I am adamantly opposed to this rule change. There has never been any history of problem bears because of bear baiting with unnatural baits, so why is the F&G creating a rule that impacts the hunter when it is not needed. This seems to be another case of F&G trying to overstep when it isn't necessary in my opinion. I am afraid that if this rule is implemented that as the grizzly population grows more and more hunting freedoms will be taken away. Conflict between grizzlies and human beings are inevitable especially in rural areas. My desire is that they would be managed with wisdom not overreaction.

Submitted Jan 20 2014 - 8:16pm



Negotiated Rulemaking - Bear Baiting Comments

Darrin Stark

If it isn't broke then don't fix it. I think that changing the bear baiting rules would certainly affect the way people hunt. I personally will stop hunting bears in general. The bear population in Island Park is plentiful and if you change the rules it will make it more difficult to hunt them. The elk, moose, and deer are already having a hard time coping with the wolves by enforcing stricter baiting rule will only increase the bear population and that will directly affect deer, elk, and moose herds. I have big game hunted my whole life and it would be devastating if the rules are changed. It is a way of life for my family and we have built traditions here in Idaho by hunting big game.

Submitted Jan 20 2014 - 9:37pm



Negotiated Rulemaking - Bear Baiting Comments

Tyson

Changing the rules on bait that is used is not going to solve the problem! Open a hunting season on grizzly bears will. Keeping them scared of humans will help more because if they smell a human they may leave. Solving attacks on animal kills and anything else humans may be involved in. Right now they are not scared of anything because they are dominate!

Submitted Jan 20 2014 - 9:46pm



Negotiated Rulemaking - Bear Baiting Comments

Tiffany Marez

The subject of non-natural bear baiting being harmful seems to be an unfair claim. Bears will associate any planted food with an easy meal and relate it to humans, whether the food is processed does not matter. This seems like an attempt to get rid of houndsman, not an issue with bear safety. This is an unfair move against sportsmen who pay their fees and follow the rules.

Submitted Jan 20 2014 - 10:16pm



Negotiated Rulemaking - Bear Baiting Comments

Louie Marez

The subject of non-natural bear baiting being harmful seems to be an unfair claim. Bears will associate any planted food with an easy meal and relate it to humans, whether the food is processed does not matter. This seems like an attempt to get rid of houndsman, not an issue with bear safety. This is an unfair move against sportsmen who pay their fees and follow the rules.

Submitted Jan 20 2014 - 10:17pm



Negotiated Rulemaking - Bear Baiting Comments

Nick Beatty

IDFG

I fully support the proposed rule change rule change concerning bear bait. Natural bait should be the only bait allowed in bear baits. I have come across too many nasty non-natural bear baits in the woods. If the bear population were to increase due to this rule change, then I would like to see this subject revisited.

Thanks

Nick Beatty

Submitted Jan 21 2014 - 7:38am



Negotiated Rulemaking - Bear Baiting Comments

Rex

Your job as fish and game is to manage the different populations of wildlife. By eliminating bear baiting for black bears you are taking away a very important method of take. You are going to increase the black bear population and cause further destruction of our deer and elk populations. We already as you well know have enough problems with this due to wolf reintroduction! Pull your heads out and manage all predators the way they need to be. Idaho is turning into one of the worst quality hunt states alreadyplease stand up and do what is necessary to manage all wildlife appropriately.

Submitted Jan 21 2014 - 10:01am



Negotiated Rulemaking - Bear Baiting Comments

Dale Tomechko

Sent: Monday, January 20, 2014 9:30 AM

To: IDFGINFO

Subject: WEB SITE - email

This message was sent from the IDFG website.

Dale Tomechko writes:

My response to changes to bear baiting in grizzly country. I don't think the bears weather it be black or grizzly care or can tell if its natural food or human food on a bait station. A easy meal is way better then a hard to find one. The idea is to minimize bear human wrecks we have to educate the folks who go in bear country they can get hurt! And its there responsibily to avoid a wreck.

Submitted Jan 21 2014 - 12:49pm



Negotiated Rulemaking - Bear Baiting Comments

Kevin Merrill

I do not agree with the proposal. Natural baits should include grains, honey, natural sugars and oils. If these are added I would feel good about the proposal. However if bears are becoming problematic, then maybe there are to many of them and more hunts should be allowed. If Grizzly bears are that abundant perhaps it is time to start controlled hunts for them.

Submitted Jan 21 2014 - 12:53pm



Negotiated Rulemaking - Bear Baiting Comments

Terry Beck

Mr. Rachael,

I am opposed to the new restrictions adding to bear baiting.

Grizzly's are not going to make a conscientious decision about not coming on to a bait that has only meat or a bait that has doughnuts. The Bait isn't the Problem, the problem is we have to many grizzly's.. I will not support anything that mess's with our existing laws on bear bating and the bait that we can use.

I feel as though restricting the type of bait useage will be only the first step in closing bear baiting all together.

Submitted Jan 21 2014 - 3:11pm



Negotiated Rulemaking - Bear Baiting Comments

Erik

First and foremost leave it as is. I have seen what this does in other states. But if you decide you must then make the season 6 months long, let use electronic calls, or just make a safety zone around highly populated areas.

Submitted Jan 21 2014 - 3:33pm



Negotiated Rulemaking - Bear Baiting Comments

Shane McAfee

With trying to get our Predators thinned down to help our elk herds come back, now is not the time to end bear baiting as wolves can be taken off of same bait during the wolf season. This is a tool to take predators. Do not end the bear baiting.

Submitted Jan 21 2014 - 4:23pm



Negotiated Rulemaking - Bear Baiting Comments

Austin Atkinson

Mr. Jon Rachael,

I write these comments along with my testimony to directly oppose the negotiated rulemaking proposal regarding bear baiting in the selected units in Eastern Idaho. I have held baiting permits, harvested bears in unit 60, and assisted with family members' black bear hunts in unit 60. I do not feel that the proposed regulation would positively affect the suggested problem of nuisance grizzly bears in the area. Problem number one is that my understanding is that baited-hunting is allowed in unit 60 and portions of 61 because it is out of the grizzly primary conservation area. I understand that the current grizzly bear populations have spread west and continue to inhabit these outlying areas. I have had many sightings of grizzly bears while actively hunting in unit 60 and am fully aware of the problem at hand. I understand the problems that may arise in the Island Park residential areas from nuisance grizzly bears, but do not feel that the simple change of baiting substance to be the answer for the problematic grizzly bears. The background information and suggested statistics given to the public with this proposal have not been sufficient to provide adequate reasoning to devastate the black bear hunting opportunities for Idaho hunters.

I feel that the passing of the proposed rule would complicate the process of bait inspection and breed confusion on legal substance use for baiting purposes. I also feel that the passing of this regulation would not affect the probability of creating nuisance grizzly bears. The regulation is biased against those hunters desiring to hunt in eastern Idaho, while not addressing the issue of nuisance black bears that may exist in other portions of the state. Black bear harvest numbers in the affected units will decline and illegal baiting will result in more citations. Please consider our hunting opportunities and privileges before changing the regulations regarding bait substances.

Please see the attached pdf for the Primary Conservation Area as released by the US Fish and Wildlife Service regarding the area designated as a grizzly bear inhabited/managed area. The implication of rules created on behalf of grizzly bear populations outside of this area should be considered unjust and not in compliance with federal designations.

Sincerely,

Austin Atkinson Idaho Lifetime License Holder

Submitted Jan 21 2014 - 7:02pm



Negotiated Rulemaking - Bear Baiting Comments

Nick Natoli

We need to manage grizzly bears not put controls on bear baiting. Grizzlies are at a point were they need to be taken of the endangered species list and start managing them as a big game animal. This is just a way to put a band aid on a problem so we get these animal rights activists off our back. Let the biologist manage the bears as the professionals not the animal rights groups. Regulating the kind of bait that can be used won't stop bears from human contact and their garbage. Nuisance bears are usually on private property were people live in bear country. How are you going to know the difference from salvaged road kill and other legally taken wild game. I have asked to use beaver in the past and was told no by a game warden now it is convenient when we want to change baiting requirements. Grizzly bears are the problem not black bears don't make sportsman suffer because we are not managing grizzlies. Grizzlies are going to become no different than the wolves we are ignoring what is going to happen if we don't start harvesting a few. Look at the damage the wolves have done and we ignored it for years until it was to late. This is just a band aid not a fix to the problem, let's fix this one right the first time without making the sportsman suffer in any way.

Submitted Jan 21 2014 - 7:04pm



Negotiated Rulemaking - Bear Baiting Comments

Coulton

Hunting Black Bears with bait is already hard enough, if you take that away it will be nearly impossible. The Black Bear numbers are already high and will get even higher if we are switched to natural bait. All I ask is that you allow us to continue to hunt with artificial bait and enjoy the sport of hunting Black Bears in this great state of Idaho. I say no to the new regulations. Thanks.

Submitted Jan 21 2014 - 7:42pm



Negotiated Rulemaking - Bear Baiting Comments

Adam Mott

Restricting baiting to only meat will push me out of the bear hunt. I would assume that many other hunters like myself rely on cheap, readily available "garbage" because we cannot afford otherwise. Unless you want to start paying for my gas, or providing meat I just may have to call it quits.

Submitted Jan 21 2014 - 8:13pm



Negotiated Rulemaking - Bear Baiting Comments

Leon Brown

Real bear problems arise when the natural food sources fail such as the huckleberries, the huckleberry crop completely failed in northern Idaho in 1997 and there were around 500 black bears relocated, harvested or destroyed by the department, hunters and homeowners in unit 1 alone, in fact the absence of baiting in unit 1 was almost certainly a cause for so much bear/human conflict since none of the other units in Region 1 had nearly the conflict unit 1 did, all these units are open for bait AND hounds whereas unit 1 is open for neither. Granted, until federal classification of grizzlies is changed the actual management of grizzlies is not possible however making it more difficult for bear hunters to harvest sufficient numbers of black bears is not the answer. As far as natural vs. unnatural food goes a bear is smart enough to avoid conflict with humans if possible, if natural food is abundant many bears will leave anything that may be associated with humans alone, including our baits. A bear also has to gain enough weight to survive through the winter and the more scarce food is the more willing they are to take chances to get it, I would have to think a bear with a belly full of oats & molasses would be much less likely to raid a camp, home or cabin or kill livestock for that matter than one that was virtually starving, by restricting the type of bait that can be used we might very well be just removing one more food source for bears already desperate in times of shortage, regardless of whether the bear is a black or a grizzly or whether the food is natural or not. In today's world most serious hunters own a trail camera or two and they get used by those who employ bait for bears, this makes bait hunters and hound hunters who use baits to start tracks inherently less likely to have a grizzly conflict unintentionally than those using spot and stalk techniques so I believe targeting bait as a way to minimize conflict between bears and humans in general is misguided policy and will only result in senseless regulation. Aside from very hungry bears very dominant boars and very old bears generally tend to risk human encounter more often as well, dominant boars because they simply are not afraid of humans and old bears because they are desperate for calories because of their deteriorating condition, in both cases increased hunting pressure = less conflicts, once again this does not address the grizzly issue but in an overall bear population view restricting bear hunting will not provide less competition for natural food that is available, guite the contrary actually.

Although this is not intended affect northern Idaho right now once the department makes this a policy it could be implemented in any unit, and likely would be in units where grizzlies could possibly be and that description could cover most of the state in the not too distant future. To me this sets a dangerous precedent of restricting opportunity due to the presence of grizzly bears, what will we do when they are in almost every big game unit, restrict them all? I think if the bears are doing well enough to be involved in conflicts in new areas and units they have not had conflict in since 1986 when they were listed this would mean there is a growing number of bears and although we all have to be aware and tolerant of them I do not think we should continue to add restriction on activities in general because of them, it just makes no sense for a state with a growing grizzly population, if you subscribe to this idea I believe you are subscribing to an agenda of decreased black bear hunting opportunities and recreation opportunities in general through grizzly bear management policy, and I believe grizzlies will occur in the majority of the state eventually. This proposed rule has no benefit that I can see from my 30+ years of dealing with wild bears in Idaho and across the western United Sates, albeit almost strictly black bears.

Negotiated Rulemaking Comments

Bear Baiting - Comments From January 2014

Leon Brown Clark Fork Outfitters Clark Fork, Idaho.



Submitted Jan 21 2014 - 9:30pm



Negotiated Rulemaking - Bear Baiting Comments

Jessie

Leave it alone, all this is, is a start to eliminating bear baiting entirely. We know better by now when rewriting a law is just the start in chiseling away until its gone. Good law abiding citizens been doing it for years and it hasn't hurt anything. It's just like the wolf situation our forefathers eliminated them for a reason and now with anti everything folks out there we are struggling to maintain healthy deer and elk populations. This to holds true in Washington which out lawed hound hunting for cougars now we have seen a huge decrease in deer populations. Just leave it alone its worked great for years, like the ole saying goes if it ain't broke don't fix it.

Submitted Jan 21 2014 - 9:38pm



Negotiated Rulemaking - Bear Baiting Comments

Jared Allen

I do not support the change to bear baiting. I would like to see the research that shows bears will seek out non natural or processed foods.

Bears are just looking for an easy meal. It doesn't matter what you have or have not fed them they are gonna take advantage of any meal they can find.

It is already hard enough finding bait. Where do you expect people to get enough roots and berries to keep a bait stocked? Furthermore I don't think it's even

a good idea to put stuff like that out to the public. It's just going to give the anti's more ammunition to try and get baiting outlawed and then they will work on hound hunting all together.

Submitted Jan 21 2014 - 9:56pm



Negotiated Rulemaking - Bear Baiting Comments

Cody Mortensen

I believe grizzlys need to be managed just like any other preditor. Restricting black bear hunters on what they can use to hunt isn't the answer. Why punish Idaho hunters for a problem that the federal government has made by keeping grizzlys on the endangered species list. Not right and doesn't make sense. I've hunted a lot in eastern Idaho and wouldn't be happy at all with this change.

Submitted Jan 21 2014 - 10:28pm



Negotiated Rulemaking - Bear Baiting Comments

josh fodge

Real bear problems arise when the natural food sources fail such as the huckleberries, the huckleberry crop completely failed in northern Idaho in 1997 and there were around 500 black bears relocated, harvested or destroyed by the department, hunters and homeowners in unit 1 alone, in fact the absence of baiting in unit 1 was almost certainly a cause for so much bear/human conflict since none of the other units in Region 1 had nearly the conflict unit 1 did, all these units are open for bait AND hounds whereas unit 1 is open for neither. Granted, until federal classification of grizzlies is changed the actual management of grizzlies is not possible however making it more difficult for bear hunters to harvest sufficient numbers of black bears is not the answer. As far as natural vs. unnatural food goes a bear is smart enough to avoid conflict with humans if possible, if natural food is abundant many bears will leave anything that may be associated with humans alone, including our baits. A bear also has to gain enough weight to survive through the winter and the more scarce food is the more willing they are to take chances to get it, I would have to think a bear with a belly full of oats & molasses would be much less likely to raid a camp, home or cabin or kill livestock for that matter than one that was virtually starving, by restricting the type of bait that can be used we might very well be just removing one more food source for bears already desperate in times of shortage, regardless of whether the bear is a black or a grizzly or whether the food is natural or not. In today's world most serious hunters own a trail camera or two and they get used by those who employ bait for bears, this makes bait hunters and hound hunters who use baits to start tracks inherently less likely to have a grizzly conflict unintentionally than those using spot and stalk techniques so I believe targeting bait as a way to minimize conflict between bears and humans in general is misguided policy and will only result in senseless regulation. Aside from very hungry bears very dominant boars and very old bears generally tend to risk human encounter more often as well, dominant boars because they simply are not afraid of humans and old bears because they are desperate for calories because of their deteriorating condition, in both cases increased hunting pressure = less conflicts, once again this does not address the grizzly issue but in an overall bear population view restricting bear hunting will not provide less competition for natural food that is available, guite the contrary actually.

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Submitted Jan 22 2014 - 12:00am



Negotiated Rulemaking - Bear Baiting Comments

Ben Dahlstrom

I dont feel that this will help a thing. One more regulation???? Realy??

Submitted Jan 22 2014 - 1:15am



Negotiated Rulemaking - Bear Baiting Comments

Tim Henderson

Hello Mr. Meints. My name is Tim Henderson, and I am writing in response to the change in regulations for baiting black bear within grizzly bear habitat. I am not a hunter, bear or otherwise, but I feel that I do have a unique perspective regarding this issue. On April 10th of 2007

I had an unfortunate encounter with a grizzly bear behind the cabin that I rented off of Rammell Mt Road. The bear had dragged a winter kill moose out of Bull Elk Creek up behind our cabin without our knowledge, let alone our consent. On that night our dog had stirred this bear up by trying to chase it off it's kill. When I went out to retrieve our barking dog, unaware of the situation, I unfortunately got in the middle of the scene.

That evening I was life-flighted to EIRMC where I received medical care for severe wounds as result of my mauling. These included deep lacerations to my back from shoulder to ribs, across my lower back from hip to spine, down my thigh and a scalping. I ended up with approximately 300 stitches and the loss of half my blood. I feel very fortunate to be here today.

I would ask that IDG&F give serious consideration to the practice of bear baiting. The use any food source as an attractant seems to have the potential for increasing interactions between bear and people regardless of the intent. If people choose to bait bear as a means of hunting them, I would suggest that those same people out of ease or efficiencies would not stray too far from the beaten path. Baiting in or near areas that are readily accessible by others could potentially have terrible consequences. Please keep people out of a possible situation that I am unfortunately all too familiar with.

Thank you. Tim Henderson.

Submitted Jan 22 2014 - 7:27am



Negotiated Rulemaking - Bear Baiting Comments

Jeffrey Klausmann

Dear Daryl-

Thank you for the opportunity to comment on proposed changes to bear baiting regulations in grizzly bear habitat expansion areas like Teton Basin (unit 65). I will note that I am an avid Idaho sportsman and hunter education instructor but I am also the father of 3 young boys from a family that recreates (hiking, biking, fishing, horseback riding etc.) extensively in the backcountry during all seasons. First off I commend the Department for proposing these rule changes - I only wish they went further. First I will address the rule generally and then speak more specifically about the actual language being proposed.

In general I oppose black bear baiting in grizzly habitat for the following reasons (ordered in level of importance):

- Human Health and Welfare baiting in grizzly range is irresponsible and puts the wants of a few bear hunters over the safety concerns of all other backcountry user groups setting up the perfect storm for risky bear/human conflicts that usually result in serious human injury (or death) and almost certain destruction of bears.
- Inconsistency with other agencies and jurisdictions bear baiting in grizzly country is simply out of line with current Forest Service and Teton County bear management regulations that mandate securing food and garbage to prevent conflict. How is it that I can be ticketed for not securing a cooler in a hard sided camper but bear hunters can go into the forest and deliberately attract bears with bait?
- Fair Chase Baiting is untenable within the principles of Fair Chase. Let's not forget that our population (of hunters) is falling and continually scrutinized by the public, can we really afford the negative press that baiting usually brings on?
- Hunter Opportunity I would like to see IDFG designate these areas as trophy bear areas, requiring only spot and stalk hunting and eliminate the baiting. Perhaps IDFG could even increase opportunity by extending the seasons slightly under this management scenario.

Specific comments on the changes being proposed:

- Enforcement Challenge this regulation seems very difficult if not impossible to enforce. How for example are officers to determine the contents of slurries? Will these be outlawed under the term unprocessed? Maybe some further clarification would help Perhaps specifically outlawing slurry could fix this or maybe a stipulation requiring the use of recognizable plant and animal parts?
- Naturally occurring fruit are apples, pears and other grocery store fruits acceptable? I suggest revising this to include only fruits of species native to the area and reference a native plant list.

Thanks very much for the opportunity to comment.

Jeffrey Klausmann, Principal Intermountain Aquatics, Inc. 116 Mustang Drive/P.O. Box 1115

Negotiated Rulemaking Comments

Bear Baiting - Comments From January 2014

Driggs, ID 83422

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www.intermountainaquatics.com



Submitted Jan 22 2014 - 7:29am



Negotiated Rulemaking - Bear Baiting Comments

Logan Sorensen

I am opposed to the proposal to limit bear bait to "natural" foods in the Isalnd park area. In this area the reason is to prevent grizzly bears from becoming habituated to human food, Has this happened? How long until similar bait restrictions are extended to other areas for an increasing number of reasons. I can only see this setting a bad precedence. Soon, only natural bait will be allowed in many more areas for whatever reason someone comes up with. Acquiring enough natural bait to run a successful baitsite is beyond the reach of the average sportsmen. The expense would be enormous to purchase enough apples and berries to fill a 50 gallon barrell once or twice a week. Especially in the spring when these foods are not in season.

I once ran a fall baitsite using primarily apples collected from highway right of ways and old orchards on the edges of farms. However those resources are not available in every area like where I currently reside and they are also not available in the spring when most hunters prefer to do their bear hunting.

I appreciate that this may be a precautionary measure to prevent some in the general public from turning against bear hunting with bait entirely but if this proposal goes forward I think you would do just as well to close the spring bear season as to require natural bait.

Submitted Jan 22 2014 - 9:16am



Negotiated Rulemaking - Bear Baiting Comments

Andrea Santarsiere for Greater Yellowstone Coalition

See attached letter: Summary comments: adopt regulation in place in Wyoming that requires a bear bait to be abandoned for the remainder of the season if a grizzly bear is found to be using it.

Recommends IDFG prohibit use of bear baiting within all occupied grizzly habitat.

Submitted Jan 22 2014 - 9:54am



Negotiated Rulemaking - Bear Baiting Comments

Greg Roach

There is not enough data to support your changes. I am opposed to this change. It appears to be a kneejerk reaction.

Submitted Jan 22 2014 - 11:03am



Negotiated Rulemaking - Bear Baiting Comments

Erin Edge for Defenders of Wildlife

DOW Recommends eliminating bear baiting in occupied grizzly habitat. Switching type of bait will not redue conflicts at or near bait sites, nor bears shot because of public safety or personal protection. See attached comment letter.

Submitted Jan 22 2014 - 11:09am



Negotiated Rulemaking - Bear Baiting Comments

Anna Trentadue

Dear Mr. Meints:

I have grown up in a hunting family, and am married to an avid hunter who has also worked as a hunting guide. When he is old enough, it is my hope that my son will also become an avid Idaho sportsman as well. I am philosophically opposed to bear baiting because it runs contrary to the principles of "fair chase." It also paints sportsmen in a bad light at a time when the public portrayal of hunting is under great scrutiny.

I realize that IDFG is probably not likely to ban bear baiting all together - but you should. Thus, in the mean time, I support IDFG at least changing its rules on bear baiting so that there is structure and regulation behind what constitutes "bait" and where bears may be baited. Natural bait should have to be used - not slop from people's kitchens. And the location of such bait should be strictly defined.

Thank you for considering my comments.

Anna Trentadue Driggs, Idaho

Submitted Jan 22 2014 - 11:33am



Negotiated Rulemaking - Bear Baiting Comments

Troy Hilder

Comments taken by phone. Caller is a serious bear baiter who lives in the Ashton area because if its close proximty to bear hunting opportunities. In his experience, grizzly bears are mostly attracted to baits with meat and meat will keep them coming in. He works conscientously to avoid attracting grizzlies but when they do show up at one of his baits, he shuts the bait down until the bear moves on. Feels grizzlies will continue to be a problem until they can be delisted and hunted to the extent that they learn to fear people more and avoid them.

Feels grizzlies will come to an attractive bait regardless of food type and that restricting hunters to natural baits may make the problem worse. Has had trouble with grizzlies taking over his elk during archery season when he is packing out. Afraid that use of natural baits like road kill will keep grizzlies coming back to the bait. If grizzlies could be hunted they may be less of a problem.

He does understand the need to strive to minimize problems with grizzlies, but mostly is fighting to maintain his rights to hunt black bears. Does not want to lose more areas to bait for black bears.. Also feels that bear meat would be less palatable if hunters were required to bait with natural baits such as game meat. Also concerned that some dishonest individuals would poach deer and elk to use as bait because road-kill will be hard to come by and too difficult to maintain a bait.

Doesnt think adoption of the proposed changes will result in any reduction of conflicts with grizzly bears.

Submitted Jan 22 2014 - 1:32pm



Negotiated Rulemaking - Bear Baiting Comments

Jason Kotter

I am simply writing to share my comments on the proposed rule changes and express my opposition to the proposed rule changes.

I don't agree that human/grizzly bear conflicts are a result of conditioning bears to eat non natural foods. Grizzly bears are instinctively conditioned to eat, no matter the food source. To conclude that the non natural food conditions bears and leads to human/grizzly conflicts I think is incorrect. That conclusion ignores the fact that bears simply look for the easy meal and makes a leap by assuming that bears that eat non natural foods are more likely to become nuisance bears. I don't believe that the type of food a bear eats makes a bear a nuisance bear. In my opinion a nuisance bear is a bear that has repeated conflicts with humans or causes property damage. I don't think the diet of a bear makes a bear a nuisance bear. I am sure that there are many bears that have frequented a bait site with non natural foods that have never become nuisance bears.

My problem with the rule change is that the rule points to the type of bait as what creates a nuisance bear and that hunters and the bait they use are the cause. First the rule change doesn't change the fact that bears by instinct will find a bbq on a deck, a bird feeder in the yard, fruit trees and garbage cans by the back door. Those are the nuisance bears and the bears that create conflict. I just don't see any evidence that would indicate that bears fed non natural foods at a bait site are likely to become nuisance bears and that using natural food would lead to a decline in nuisance bears.

Data and studies don't show that bears that eat non natural foods become nuisance bears. What we can learn from studies is that most bears that cause nuisance problems are young males that have been driven away by their mother, and threatened or attacked by older males. In their search for food, it is most often these young males that come into contact with humans and cause problems.

I see this behavior all the time at my bait sites as the younger bears visit the site during more daylight hours to avoid conflicts with larger and older males. I have seen younger bears chased off of bait by these larger bears many times. This is natural behavior that forces the younger bears to adapt and find different habitat and food sources. It's natural behavior that leads to more human contact as these bears overcome their fear of humans and they learn to tolerate this contact.

That's my biggest problem with these rule changes. It's as if we anticipate bears to change their nature and their instincts if we put different food at bait sites. I don't see the bears changing their instincts and I don't see the data or studies to prove that.

What hunters can do is use bait to condition a bear to visit a specific site because they associate that site with a meal or reward. We have existing regulations that address the placement of bait sites, the proximity of those sites to a residence or an established campground, a trail, a road or a water source. Perhaps what is happening is that we simply have more homes or campsites encroaching into grizzly bear habitat. Maybe we should look at the regulations regarding the locations of bait sites and make revisions to those regulations in these three specific areas in stead of expecting bears to change their

Negotiated Rulemaking Comments

Bear Baiting - Comments From January 2014

behavior and habitat.



I think there could be some negative side effects to these regulation changes. Personally I doubt I would consider baiting in these three areas. The rule change would make baiting too difficult. I would have to find access to some sort of natural food source. Those natural food sources would be difficult to find in the spring time when I prefer to bait. For example where will I find a load of apples in the spring time? That type of source could be easier to find in the fall after the growing season, but at that time I would be participating in other big game hunting opportunities. I think many other hunters would be doing the same in the fall. In the spring most hunters would be forced to purchase that type of bait unless you had a source for it in the fall and could store it through the winter. Purchasing the bait would drive the cost of baiting up and push participation down. What would be the effect on the black bear population if hunters simply decided not to hunt in those areas with new regulations? Would these regulation changes be counterproductive?

I'm also concerned that grizzly bear territory is going to continue to expand. I don't like the idea of these regulations being adopted in other units in the future.

I simply can't support these regulation changes. I don't believe what hunters feed bears at their bait stands makes bears nuisance bears. I have spoken with many other bear hunters, particularly those who use bait. I don't know how many comments will be sent in but I can say that everyone I have spoken with shares my feelings and are opposed to these rule changes.

Submitted Jan 22 2014 - 2:40pm



Negotiated Rulemaking - Bear Baiting Comments

greg harwood

is there a problem? have there been nuissance grizzly bears? i dont think changing the way people bait bears is going to solve bear problems. if a grizzly wants to come around people he is going to do it weather he is eating fruit or dog food. they have no fear of humans, because we dont hunt them, if there is getting to be that many grizzly bears, than maybe we should look at having a special season. i do bait bears, not in a grizzly area and i also have dogs. how many people have ever seen a Mountain Lion just out walking around? not very many, but here in Idaho we hunt them with dogs, the mountain lion stays away most of the time. now i know there has been the occaisanal mtn lion come into town. but overall not seen very often.i think the baiting laws are just fine. we changed the distance from road and trail, distance from stream's. the baits that i run are away from people. my 2 cents

Submitted Jan 22 2014 - 4:25pm



Negotiated Rulemaking - Bear Baiting Comments

Kevin Kotter

As an Idaho resident and a black bear hunter, I would like to comment on the proposed rule. I am opposed to the new rule and hope to see that it does not move forward. The argument seems to be based on the idea that if a bear is subject to natural bait vs. non-natural bait that this bear would not become conditioned to be a nuisance bear. This is not a logical argument. Based on my own experience with baiting bears and the studying that I have done on bears in general, it seems that the type of bait used would make no difference on whether or not a bear would have nuisance tendencies or not. When a bear is being baited, it is being conditioned. The tendency for a bear to be a nuisance bear involves a number of factors... A bait site, whether natural or non-natural will condition a bear to frequent a certain location no matter what, but a non-natural bait site is not to be considered or compared to a garbage site. From what I have seen, the tendency for a bear to be a nuisance in the woods, in public, or on private property, is due to their undeniable curiosity. It seems to me that the real problem is a grizzly bear problem. I believe there are certain steps that landowners can take in order to minimize nuisance grizzly bears without intruding on the way a black bear hunter hunts. Grizzly bears will always be a nuisance as long as they are in the area. Conditioning a bear to a natural bait is not going to discourage a bear from entering that particular area or location, therefore this proposed rule wouldn't even be addressing the problem. The best thing that these landowners can do to prevent nuisance bears is to practice keeping a clean environment to discourage items such as garbage or brush piles that can encourage nuisance activity or create curiosity in bears. Maybe the landowners are currently doing an effective job at this, but the bottom line is that conditioning a bear to a natural bait is irrelevant to whether or not the bear will become a nuisance bear. This isn't a platform for me to make suggestions to the land owners, but it is a platform for me to strike down an argument that makes no sense. The fact of the matter is that the proposed rule would not have the desired effect. If this rule is passed, then as the grizzly population continues to spread into other areas in Idaho, more rules will be passed on other areas. The fact that we might limit bear hunters, even if it is a select few, in this particular area is unfair to these hunters. It is almost like a form of punishment to them, as non-natural baiting is virtually impractical for most hunters. In turn, this would have a severe impact on the ability to effectively hunt and take black bears in this particular area.

Submitted Jan 22 2014 - 4:41pm



Negotiated Rulemaking - Bear Baiting Comments

Brandon Butikofer

I feel you should keep bear baiting the way it is. As far as natural bait goes for black bears, I feel you are going to see more poaching in deer because people can't find natural baits. By the way don't grizzly bears eat the same thing as black bears!

Submitted Jan 22 2014 - 6:31pm



Negotiated Rulemaking - Bear Baiting Comments

Matt Bitter

I think that the baiting regulations should stay the way that they currently are.

Submitted Jan 22 2014 - 8:25pm



Negotiated Rulemaking - Bear Baiting Comments

Mitch

I dont think the law should change. It worries me that if you force people to only use "natural" bait that may give people a reason to poach our other big game species in order to keep baits full. its not worth the risk. Keep the law the same...

Submitted Jan 22 2014 - 8:27pm



Negotiated Rulemaking - Bear Baiting Comments

Ron Stacey

Dear Sirs,

in my humble opinion your natural bait proposal is a bunch of B.S.. If you want to do away with bear baiting in certain areas, or all together, at least have enough backbone to make the proposal up front and let it stand or fall on its own merits. Your proposal to lessen grizzly confrontation reminds me of the guy who closes his eyes, turns his head, and holds out a bandaid to someone who has just had an arm or leg severed, and tells everyone how much he did to stop the bleeding. what a joke. for the last forty five years i have hunted, fished, hiked, camped, and yes even baited bears in the areas in your proposal, and other areas that are now closed to baiting. anyone with the sense God gave geese could tell you your problem is not the type of bait, or even bear baiting itself. the real problem is there are too many grizzlies and their numbers and territorial range is growing by leaps and bounds. until you find a way to control the increase in numbers and range of an endangered species which hasn't been endangered for ten years, your problems are going to continue to grow. grizzlies have no reason to be afraid of any human at this point. eliminating a problem bear the first time it steps out of line instead of moving it a half a dozen times or more through its life, would do more to help solve the problem than any type of bait restriction ever could. all your proposal, if passed, will do is put another unneeded restriction on sportsmen of idaho while allowing your department to claim it did all it could. mark my words, as long as the numbers and range of grizzlies are allowed to increase unchecked, people's property and lives are going to be put at an increasing risk.

Submitted Jan 22 2014 - 10:07pm



Negotiated Rulemaking - Bear Baiting Comments

Sheldon Crofoot

I strongly disagree with the new proposals on limiting the types of bait that can be used. I feel there should not be any new limitations added. The new limitation seem to me to be a way to make it more difficult for the sportsman to bait. I am pretty sure a bear can not tell if he is eating storebought honey verses non store bought or if the meat was a scrap from a butcher shop verses roadkill. The new proposals are simply a way to make it tougher for the sportsman. I VOTE NO.

Submitted Jan 22 2014 - 10:20pm



Negotiated Rulemaking - Bear Baiting Comments

Tim Thomas

Daryl , Knowing that you have probably heard all the reason not to change the bear baiting rules in unit 61 60 . I as an outfitter in unit 61 agree with most of them. The proposed will make It all most impossible to keep a baits going. Sincerely, Tim Thomas

Submitted Jan 23 2014 - 7:05am



Negotiated Rulemaking - Bear Baiting Comments

Bo Crofoot

Sent: Wednesday, January 22, 2014 11:47 PM

To: IDFGINFO

Subject: WEB SITE - email

This message was sent from the IDFG website.

Bo Crofoot writes:

January 22, 2014 I am commenting on the proposal to require a bear identification course and to use only natural baits. I oppose the changes. Especially as the increase of cost and difficulty finding bait will occur. The course seems more like red tape and a profit center for IDFG. Please consider my opposition and dismiss the changes or at least delay for another year for better public education, as I feel this has not been done on this issue.

Submitted Jan 23 2014 - 6:20pm



Negotiated Rulemaking - Bear Baiting Comments

B. Compton

Fax received Jan 22, 2014.

Submitted Jan 29 2014 - 8:50am





Ridgerunner Outfitters LLC

(801) 633-3264 • PO Box 756, Kamiah, Idaho, USA 83536

10 January 2014

Jon Rachael
State Wildlife Game Manager
Idaho Department of Fish and Game
P.O. Box 25
Boise. Idaho 83707

Re: Negotiated Rulemaking - Bear Baiting

In the most economic troubled time since The Great Depression, this proposal is counterproductive and relatively ineffective. As an avid hunter and an Outfitter, it has been my experience that bears don't really care about the source of their food. They are not only omnivorous - They are also greatly opportunistic and will consume most anything edible they encounter. Although it appears that our operation area will not be affected initially; If these regulations are enacted in other units, they could be applied to ANY area in the future. Antihunting organizations applaud more restrictions placed on hunters that make it more difficult for success and consider it a victory for their cause.

Baiting is not the "Slam Dunk" method misinformed people think it is. Finding a location that bears frequent in their search for food, general access, cover and terrain, available shooting lanes, accounting for prevailing wind patterns all are pieces of a strategic puzzle that <u>may</u> just fit together (<u>If</u> the weather conditions are stable). In some areas, steep terrain, thick brush, and/or dark timber make Spot & Stalk inefficient and unproductive – In deep rock faced canyons, a Hound Hunt often turns into a 3-day hunt for your hounds (even with tracking technology).

Grizzly are naturally more aggressive than Black Bear. However, they also tend to be more reclusive. In all the miles covered, in all the time spent in the back country, and all the bait stations serviced, most Outfitters have never seen or even caught a Grizzly on Trailcam. Years ago, Black Bears in Yellowstone Park were "food conditioned" by hundreds of thousands of tourist who played with "Yogi Bear" as if they were visiting a "Gentle Ben" petting zoo. After "educating" the nuisance bears by lethal removal or relocation, Grizzlies now rule the park and are often seen at a distance. Black Bears are now seldom seen with few encounters with Grizzly Bears. Hunters want to "encounter" bears. Focus on educating the general public in the proper storage of food and refuse and enforcing orders (already in place) and they won't create nuisance bears.

The decimation of ungulates, (Elk, Moose, and now Deer) due to the ill-fated disaster caused by introduction of wolves in Idaho and surrounding States, both resident and non-resident hunters have chosen to go elsewhere. Idaho has suffered the lowest tag sales in decades as evidence of this fact. IDF&G and Outfitters are struggling financially as it is. Like any other business, we need to keep costs down to maintain prices that attract clients. In many areas, Bear Hunting has become our primary hunting activity. Collection or purchase of enough bait is hard enough without restrictions that require "natural bait only".

Fishing adventures that are mostly a "Catch and Release" activity, could quickly become "Hook 'em and Cook 'em" expeditions. Storage of non-edible parts of all game becomes a laborious and fiscal hardship. Suggesting the use of roots & berries (or any "natural" bait) is not only ridiculous, it promotes destruction of habitat. Address your perceived problem with solutions that benefit the hunters, wildlife, habitat, and the economic support you depend on – Not by supporting a liberal agenda resulting in the harvest of fewer bears, increase of predator population, and more problems. Don't contribute to the out-of-control regulatory spree going on in this Country and regulate us both out of business and further jeopardize our hunting heritage. We need to hold people responsible and accountable for their own actions – Not over regulate the actions of all by the government. When the government assumes responsibility, they liable themselves. Draw the line here and now.

The proposal attempts to justify the change because "this rule is anticipated to affect approximately 50 individuals" – How many are required to decide it's alright to do something wrong? If this number is considered so low then it would be logical that the overall impact on the problem would also be negligible. Wildlife Management decisions should be made based on science not political agendas. An area <u>can</u> support the use of bait to increase harvest opportunity, or it <u>can't</u>. Regulating something to make it impractical to do has the same affect as making it illegal. Basically, this proposed rule says: *You can still hunt over bait, but we're making is so difficult that you won't and that's what we really want to accomplish.*

Dick R Andersen Outfitter #14911



Yellowstone Country Bear Hunter's Association

PO Box 2044 Cody, WY 82414 - direct: 307-899 0461 [kondelis@ycbearhunters.org | www.ycbearhunters.org

Joe Kondelis

Yellowstone Country Bear Hunters Association 255 Upland Court Cody, WY 82414

January 17, 2014

To whom it may concern,

It has come to our attention that increase of grizzly bear use in bear management unit 60 and 61 has prompted officials to review the use of bait in portions of these districts as a legal means to take black bears during open seasons. It is our concern that this closure of bait hunting in any unit not already closed will displace hunters, further bridge the social acceptance gap of grizzly bears, and create a larger human bear conflict issue in areas surrounding Yellowstone Park. It is our goal in the following document to outline our concerns with this proposal.

OBJECTIVE

Provide insight into this closure and the effects it will have to the Commission and IDGF through the views of hunters and sportsmen in Idaho. Develop a working group to develop a plan for baiting in grizzly use areas. This plan will involve more responsibility on hunters and officials in areas of grizzly use. Compromise, not closure is key in dealing with this issue. Is grizzly bear management the real issue and reason for closure? A deeper look will determine that human management is the reasoning behind this closure. We can control human use but must walk a fine line between regulation and closure.

GENERAL CONCERNS

1. Increase of baits and hunters in other bear management units due to displacement

- A. 365 Baits where registered in Bear Management Units within the Upper Snake River Region.
- B. Potential for bait hunters to branch out into different areas of Idaho and create hunter conflict, more trash, heavier land use, & higher bait concentration in accessible areas.
- C. This over index of baits in accessible areas will no doubt affect how IDFG is able to manage black bears. Increase in harvest in accessible areas and decrease in harvest in non-accessible areas will have effects on health of species in all units.
- D. Idaho currently has no way of managing how many hunters may bait certain units. This lack of control will make it tougher to govern hunters that are moving into new areas to bait creating the overcrowding index. The end result will be more hunters vs. hunters, hunters vs. general population, and hunters vs. IDFG issues.

2. Right of Choice

- A. This closure will eliminate right of choice for hunters. Hunters should be able to choose to hunt in grizzly use areas. This is a fundamental right our country was built on. This closure eliminates a right of the citizens of Idaho.
- B. This elimination of choice will further lessen social acceptance of grizzly bears. Social acceptance not biological sustainability is the single most important factor in grizzly recovery. Hound and bait hunting makes up almost all of hunting methods in this area.
- C. This closure opens up a door for more closures in the state. Several units are being used by grizzly bears. As grizzly numbers reach all time high and if there home ranges and distribution increases there will be more baiting/hound bans in different districts further limiting hunter opportunity and ways to effectively manage bears through hunting.

3. Management issues

- A. Hunting has proven an effective way to manage bears. This closure will decrease ways that the IDFG has to manage black bear populations in the area.
- B. Increase in bear populations will negatively affect cow/calf and doe/fawn ratios in an already heavily declining population. Black bears are responsible for a large amount of fawn/calf depredation. Black bears have been found to be one of the major factors in calf loss during the spring. Bears, deer, and elk share the same feed ground in the spring; this is typically birthing grounds for deer and elk. In the most recent study on record which took place in North Central Idaho (Lochsa Drainage) in the mid-1970s indicated that 58% of the 87 Rocky Mountain Elk Calves died of natural cause. Of these natural causes 98% died due to predators. Black bears alone accounted for over 66% of the total mortality by predators. (Zager & Beecham, 2006)¹. Similar studies have taken place in Eastern Washington, Yellowstone National Park, and Jackson Hole, Wyoming areas. All indicate black bears to be one of top predators on elk calves. Only in high cougar or grizzly bear population areas do they take second in kills.
- C. An unchecked black bear population, coupled with the wolf and unchecked grizzly population will drastically affect the success of elk and deer herds in the Snake River Region. Without baits in the area more pressure will be put on bears to find natural food reducing calf and fawn survival rates.
- D. This region is heavily used by livestock industry and the increase in bear numbers will create more conflict situations. This will take more IDFG time and money.
- E. Black bears have become dependent on baits in spring and fall to supplement diet. The saturation of a larger predator in the grizzly bear will create more food conflicts in this area. Without baits for nutrition supplementation the black bear will no doubt suffer in an ecosystem with limited natural food to begin with. The Upper Snake region is a relatively dry in terms bear habitat with smaller berry crops and less natural food than other Bear Management Units in Idaho. This creates more food competition and will affect strength of black bear population.
- F. Bait sites in area and habituation of human food is not a proven threat in this area to Grizzly Bear recovery and sustainability. Mark Bruscino Large Carnivore Management Section Supervisor for Wyoming states that "Without more analysis it would be hard to argue that the actual closure of baiting would be a substantial grizzly conservation strategy".

4. Human/Bear conflict concerns and incidental grizzly deaths

- A. Some facts taken from Wyoming which has allowed baiting in new grizzly use areas. There are areas that do not allow it but have yet to close any new areas due to grizzly use. They have implemented some regulations that help them manage and control baits in these areas.
- B. Wyoming has years of experience in dealing with Human/Grizzly Conflict with the majority of bear management units within their borders. They have developed methods to allow bait hunting in grizzly use areas with great success.
- C. Mistaken ID kills in areas of grizzly use is less when bait hunting than with spot and stalk methods in Wyoming. With the onset of trail cameras and timers hunters are provided the opportunity to see what bears are in bait sites limiting surprise encounters with grizzly bears. In fact the actual number of mistaken ID mortalities in Wyoming occurs with spot and stalk hunting. When asked about mistaken ID mortalities of grizzly by black bear hunters and baiting in grizzly use areas Dan Bjornlie Bear Biologist for the Wyoming Game and Fish said "I agree that it is *currently* not a major issue, but it could become one in the future as bears move into new areas if hunters are not careful in bear ID."
- D. Area 61 is not in the Primary Conservation Area (PCA) as described in the State of Idaho Yellowstone Grizzly Bear Management Plan². For this reason alone this areas or part of areas that are not included in the PCA should not be closed to any bait or hound hunting to help facilitate grizzly bear recovery, expansion, or growth.
- E. There is a lack of concrete data and facts to support the notion that the bait hunting in area 61 has increased incidental grizzly deaths and grizzly bear habituation to human foods. It is our position that the increase in grizzly populations and increasing home range of grizzly bears is the reason for the increase human/grizzly bear conflicts and management actions.

ISSUES CONCERNING IDAHO'S YELLOWSTONE GRIZZLY MANAGEMENT PLAN & THIS CLOSURE

We have studied the *State of Idaho Yellowstone Grizzly Management Plan*² and have arrived at these issues concerning the plan and the proposed closure of the west half of area 61. This plan provides a roadmap for Grizzly Management for Idaho in the future and lays out Idaho's management policies for grizzly bears in the event of grizzly bear removal from threatened list:

- 1. Over half of the area in question for closure (61) is outside of the Primary Conservation area set forth in Grizzly Recovery Plan.
- 2. Federal Management needs of the grizzly bear are dictating state laws concerning huntable species in Idaho.
 - A. State Statute 36-103(A). Wildlife property of State Preservation Wildlife Policy²
 "All wildlife, including all wild animals, wild birds, and fish within the State of Idaho, is hereby declared to be the property of the State of Idaho. It shall be preserved, protected, perpetuated, and managed. It shall only be captured or taken at such times or place, under such condition, or by such means, or in such a manner, as will preserve, protect, and perpetuate such wild life and provide for the citizens for the state and, as by law permitted to others, continuous supplies of such wildlife for hunting fishing and trapping."

http://species.idaho.gov/pdf/grizzly_plan.pdf

Under state law grizzly bears on the threatened list are included in this statute however the area in question for closure (West half of 61) is outside the PCA. This in a sense is enabling grizzly bear to recover into areas not in recovery plan at the behest of black bear hunters using hounds and bait.

- 3. This plan was set forth to help manage grizzly bears into a successful recovery. The primary goal of almost all management of wildlife is to provide a long term sustainable population and long term annual benefits from the resource to the citizens. These plans benefit both humans and wildlife. Many things are provided by healthy populations of wildlife such as sustenance, scientific research, recreational use, wildlife viewing all of which have economic benefits to the state. The idea is that wildlife is a public resource for use by citizens of Idaho
 - A. This closure will not benefit the citizens of Idaho who utilize their resource for many of the following reasons above. This closure will directly affect black bear management and policies; it however will not directly affect grizzly bear management as they co-exist quite successfully under the current regulations in area 61 outside of the PCA. This proposed closure becomes more of a black bear management action than a grizzly management action.
- 4. The Goal of *The Idaho Yellowstone Grizzly Management Plan* ³ is to manage the recovered grizzly bear in a suitable habitat in eastern Idaho and to do so at socially acceptable levels. Social acceptance is more important than sustainability. Social acceptance depends on several issues including maintaining existing uses of the land and resources on the land. It is stated in *The Idaho Yellowstone Grizzly Management Plan* ³ that "By maintaining existing uses, people will feel less threatened both economically and in their lifestyles. They key to successful management of grizzly bears lines in bears utilizing lands that are not managed solely for them but in which their needs are considered along with other uses"
 - A. Consider the perception of the grizzly bear and management officials when this area of 61 is closed to hound and bait hunters. This will further alienate sportsmen and cause the gap to widen in the acceptance of grizzly bears and grizzly management. We want to see the grizzly recover and one day see regulated state managed hunting seasons. This move will be a large step in the wrong direction of social acceptance.
 - B. The proposed closure will be managing bears without considering needs and wants of other species that use the land. This is not keeping in line with *The Idaho Yellowstone Grizzly Management Plan* ³ and wildlife management policies in Idaho.
 - C. Grizzly bears are very good at adapting to new habitat and environments. The Draft recovery plan states that the grizzly bear will recover outside of the PCA. This adaptability will bring them into new areas and a wide range of habitat, because of this *The Idaho Yellowstone Grizzly Management Plan* ³ states that "co-existence with traditional uses will be a major determining factor in their future. Grizzly bears will not be tolerated in areas with high human activity or development.". The proposed area is outside of the PCA to begin with and In the event the grizzly bear becomes delisted and moved into state control the State of Idaho will not be allowing for the co-existence of grizzly bears with traditional uses of the land.
 - 5. In Terms of Conflict management *The Idaho Yellowstone Grizzly Management Plan* ³ goal is to "minimize the potential for human grizzly conflicts while maintaining traditional, residential, and commercial uses within Eastern Idaho…"

³ http://species.idaho.gov/pdf/grizzly_plan.pdf

- A. There is no solid concrete data to suggest that the existence of bear baits is a direct reason for increased grizzly/human conflicts in areas outside of the Primary Conservation Area where baiting is allowed.
- B. The use of hounds and bait is a traditional method of hunting. It has been used successfully for years in providing hunting opportunity for sportsmen and women as well as a successful tool at the disposal of game manager to control populations. It provides economic boosts to economies in the area during seasons and helps control black bear expanse into residential areas.
- C. This closure will greatly reduce the amount of bear hunters in this area, the end result will be more human bear conflicts as habituated black bears will no doubt seek out human foods they have become accustomed to. Also the increase in and alpha species like the grizzly will create more competition and minimize natural foods for black bears requiring them to move into new areas to find food and safety, often times these new areas are those of human populations causing more conflict.

6. Grizzly/Human Conflict outside of the PCA

A. The Portion of area 61 in question for closure is outside the PCA. Area 61 is unique in that the portion of area 61 east of Highway 20 is already closed to baiting. This portion of area is inside the PCA. Area 60 is also very close to the PCA and experiencing an increase in grizzly bear usage. The Idaho Yellowstone Grizzly Management Plan ⁴ however will have different criteria for management of grizzly bears in the PCA versus outside the PCA. Under the current plan any grizzly bear that is outside the PCA and likely to come into contact with humans is to be removed from the area. This would include bait areas outside the PCA. There will be grizzlies in direct contact with humans.

Is this the real reason for bait closure, an easier way to control management actions? The lack of human presence will limit management and removals by displacing bear hunters the state can save funds spent on would grizzly bear management in these areas.

If the Idaho Fish and Game wants to effectively manage the grizzly bears recovery to hunt-able levels they will need the help of the sportsman. Closures by Fish and Game due to grizzly use will further bridge gap between sportsman and state agencies, and further harm the public's perception of grizzly bears and how the State of Idaho is managing them.

7. Harvest Management

- A. It is a well-known fact and stated *The Idaho Yellowstone Grizzly Management Plan* ⁴ that hunting can act as a form of reverse habituation, decreasing the likelihood of human/bear conflict. Hunting also reduces management actions and money spent to perform them. This is the case whether it is black or grizzly bear. Harvest of black bears cannot decline in this area or management actions and human bear conflicts will increase. The species must be managed for its sake and the sake of the sportsmen of Idaho. With bears hunting is the best management tool, the use of hounds and bait is essential to effectively control the species with hunting seasons. It provides the sportsmen with a tool that allows them to manage the species for the State of Idaho.
- B. The need for less spends in the field of wildlife is an issue affecting many state agencies. Idaho is responsible for all black bear management actions and the money needed to fund these. By

⁴ http://species.idaho.gov/pdf/grizzly_plan.pdf

- cutting baiting and hound hunting in this area all bears even the un-hunted grizzly bear will be likely to develop habituation to humans. This will create more human bear conflicts involving both species. This will also greatly increase the amount of money needed to manage conflicts in this area. Money that the state of Idaho cannot afford to spend when the black bear can be managed by the sportsman.
- C. Chronic depredation problems will rise. The instance of human/food conditioned bears will grow in both species. Competition for natural food will increase. Management actions and state involvement in management will no doubt increase. Along with all this the popularity of both species will decline in the minds of uneducated public, this will greatly reduce the success of the grizzly recovery. Hunters and sportsmen will have a negative view of state agencies and the way they govern the public's wildlife.
- D. The lack of bait in this area as a viable food source for black bears will damage population health of the black bear.
 - The increased population due to lack of harvest will cause black bears to reach out looking for food. Black bears and even the grizzly are dependent on bait to supplement their diet.
 - Natural food for black bear is limited due to proliferation of grizzly bear. In an already
 competitive environment the increased black bear population will struggle to compete
 causing them to reach out into human use areas to obtain food.
 - Calls will increase as both species struggle to maintain healthy food stores. Bears have
 become conditioned to food. There is no changing that. You cannot "UN-teach" a bear
 what we have already allowed it to learn. They have learned that human food is okay in
 this area. Once a bear is one human food the bear will seek it out a source of food to
 sustain their diet.
 - Closing this area will not keep bears from seeking out human food. It will enable the
 species to get into more conflicts. Humans will be doing a great disservice to the bears.
 We will alienate sportsmen and the bear. How is this an effective way to manage
 wildlife
- E. The use of bait is a viable way to allow for sex identification
 - The sex of bears is often difficult for many to determine. Most times sightings are quick and at a distance. Many sportsmen are not proficient in determine sex sometimes resulting in sow harvest. While it is essential to harvest both sex of species it is greatly encouraged to harvest male bears. Bait hunting allows for closer observation of the target species before kill. Sportsmen are better able to observe and study in these cases. They can make more rational ethical decisions on harvest. This hunting method increases male harvest and decreases female harvest.
 - This method actually contributes to the health of the species. This closure because of
 grizzly bear will effect black bear management. Female mortality will increase and the
 long term health of the black bear in this area will be affected.

- F. The bear hunting seasons and methods have been set up to help facilitate male harvest and limit female mortality. The State of Idaho states in *The Idaho Yellowstone Grizzly Management Plan* ⁵:
 - "Because grizzly bear populations are sensitive to the level of female mortality, every
 effort should be made to focus the harvest on male bears in areas where it is desirable
 to have a stable or increasing species. Methods to ensure a predominantly male harvest
 include:
 - Mandatory check requirements similar to that required for mountain lions and black bears.
 - 2. Females with young may not be harvested. Neither may cubs or young accompanying a female may be harvested
 - Early closure of hunting season when the allowable female quota has been harvested. The IDFG Director may enforce emergency season closures at his/her discretion.
 - A tag fee structure would include the refund for hunters harvesting a male bear.
 - 5. Early timing of the spring hunt. Boars typically emerge from the den earlier than sows and sows with cubs.
 - Promotion of the use of hunting methods to allow the hunter a better opportunity to determine sex.

So the states own grizzly plan calls for the use of methods to limit female mortality. The closure of baiting for black bears greatly contradicts the idea of "Promotion of the use of hunting methods to allow the hunter a better opportunity to determine sex." How is this ideal okay for the grizzly bear and not for the black bear?

8. Finally, in The Idaho Yellowstone Grizzly Management Plan ⁶ it is stated that.

"Currently the use of bait and hounds is not permitted for black bear hunting in Idaho 'Bear Management Units' inside the PCA. To minimize accidental grizzly bear mortality within the PCA, this practice will be continued. We do not contest this policy, it is the best approach to ensure a healthy grizzly bear recovery, however the plan also states "There will be no additional restrictions on black bear hunting methods outside of the PCA as a result of grizzly bear distribution and occupancy. It will be illegal for a hunter to take a grizzly bear using bait and/or hounds. Grizzly bear hunters may be guided or unguided."

The states own *Yellowstone Grizzly Management Plan* ⁷ says that no black bear hunting methods will be restricted outside of the PCA. This area falls within the bounds of these statements and therefore should not be closed based on policy already in place. This idea was in no doubt put into effect to limit negative perception of grizzly bear because of the public's reduction of opportunity and rights. This negative view again will negatively affect grizzly recovery and will limit the state and federal government's efforts in recovering the species to "healthy levels"

We implore you responsible citizens of Idaho to reconsider this closer. It is our hopes that we have provided sufficient reasoning in the above text to help you come to a logical decision in this matter. It is not our wish to cause harm to

http://species.idaho.gov/pdf/grizzly_plan.pdf

the grizzly bear, if fact we want them to be recovered as it will create another opportunity for sportsmen and for sates to generate new revenues and cut spending. In order to help facilitate the right decision we have included the following recommendation that will allow for a compromise between bear hunters and the State of Idaho. We feel these recommendations will help alleviate the concerns of both parties and allow for a continue use of baits and hounds to harvest black bear while limiting human/grizzly bear conflicts.

RECCOMENDATIONS

1. Re-map Black Bear Management units so that areas do not fall within the PCA and outside the PCA. Area 61 is a prime example of an area that needs to be redistricted or remapped. Part of this area lies in the PCA and has different regulations governing black bear hunting than the other section outside the PCA.

This can cause confusion by the sportsman and general public. Such a redistricting will eliminate dual habitat districts and prevent this issue from developing in the future. If the grizzly bear is delisted and hunting seasons put in place for management this restructuring of the Bear Management Units in the PCA will create a more definitive boundary for State of Idaho to utilize in developing grizzly bear hunting districts and regulations.

2. Create a bait registration program in this area and other areas that are currently being used by both species. The State of Idaho has no current regulation on the amount of baits allowed per square mile. While sportsmen have certain regulations governing the total amount of baits allowed to them nothing limits the amount of baits placed in a certain area. This creates high bait densities within small areas. Bears especially grizzly are highly concentrated in these areas and the likelihood of human/bear conflict in high bait density areas greatly increase; also bears have a tendency to become more human/food conditioned because of this high concentration of humans and human food.

Similar to Wyoming we recommend regulating the amount of baits that may be placed per square mile. Limit usage by allowing for only 1 hunter to register and place 1 bait only per 1 square mile within a hunting district. This registration will ensure no more than one bait is placed per square mile and give the State a way to monitor land use. This information will be on hand if issues should arise and allow for a better way to monitor hunter and bear species usage for research and enforcement.

This will disperse baits into a less concentrated form. This dispersion will also limit habituation and spread food sources throughout the district. There is also some great concern over the issues arising as more sportsmen come into bear hunting and baiting. The lack of bait site regulation has created some conflicts over territory and bait sites year over year. Without registration of sites any sportsman can bait anywhere it is legal, in effect bear hunters can set bait sites 100 yards apart from each other. This is grossly inefficient and not helping the State of Idaho manages populations in their entirety. It has put sportsman in ethical dilemmas and pitted hunters vs. hunters.

This will help Idaho regulate the amount of bait hunters in the unit rather than discontinue the use of baits all together

3. Place strict guidelines governing hunters in the event their bait site is used by a grizzly bear.

Wyoming has been in this situation before and has really managed the issue remarkably. Their policies allow for black bear baiting and hunting seasons in grizzly use areas.

There is only a closure of site and only for that season, not entire year. If bait is being actively used by a grizzly bear during the spring season the Wyoming Game and Fish closes that site for the spring season only. The hunter is allowed to bait this site the subsequent fall season. This site only closure will ensure sportsmen "speak up" when sites are being used by grizzly bears. An entire district closure like proposed is causing bear hunters to ignore grizzly use on their baits in fear they will one day lose their right. By assuring them an entire closure will not occur you will create an ally in the sportsman and be able to better utilize them as a research tool to help facilitate a speedier grizzly bear recovery.

Will allow for better IDGF control and regulatory power over bait sites and bait hunters.

6.

CLOSING

Give the citizens of Idaho a chance to help manage their resource. Let them be a part of the grizzly recovery not the part against it. Your success, our success in this ongoing effort is more dependent on the sportsman than ever. It has been found years over years that hunters, fishermen, trappers are the true leaders in conservation. The North American model of conservation we still use today was mostly created by sportsmen. We have been conserving our resources longer than any organization out there, sportsman working together out in the wild. That is why we are afforded these privileges today. Before committees, working groups, non-profits, politics, summits, meetings, debates, courts, and judges there were sportsmen working toward the levels of habitat and wildlife we have today. I implore you, hear our voice, we the want what is best for the wildlife, the land, Idaho, and the ecosystem we live in more than any organization or individual out there today.

Sincerely,

Joe Kondelis

President Yellowstone Country Bear Hunters Association Jon Rachael State Wildlife Game Manager Idaho Department of Fish and Game 600 S. Walnut Street P.O. Box 25 Boise, Idaho 83707

Dear Mr. Rachael,

Thank you for the opportunity to comment on the Notice of Intent to Promulgate Rules - Rules Governing the Use of Bait and Trapping for Taking of Big Game Animals (13.01.17).

Defenders of Wildlife (Defenders) is a national non-profit conservation organization with over 1,100,000 members and supporters nationwide, including more than 6,300 in Idaho. Defenders is a science-based advocacy organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the Northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on reducing conflict through our coexistence program. Since 1997, we have spent over \$500,000 on over 250 projects designed to minimize or eliminate conflicts between people and grizzly bears. Additionally, in 1997 Defenders started the Grizzly Compensation Trust, reimbursing more than \$377,000 to ranchers in the region for livestock losses due to grizzly bears. Today Defenders continues to assist communities living in grizzly country with the tools necessary to prevent conflicts with grizzly bears and promote tolerance. These methods include sharing the cost of electric fencing projects, bear-resistant garbage storage, range riders, livestock protection dogs, voluntary grazing allotment retirements, outreach, educational materials and more. We operate these projects in partnership with local communities and residents as well as county, state, tribal and federal agencies.

Defenders recognizes the intent of Idaho Fish and Game (IDFG) to "address a public safety concern by reducing the potential for food conditioning and creation of nuisance bears in occupied grizzly bear habitat..." (NOI, pg.1). However, simply switching from one bait type to another will not reduce the potential for grizzly bear conflicts over or near the bait sites. Black bear baiting is not allowed in areas within the grizzly bear Primary Conservation Area (PCA) to reduce the chance for additional mortality. We strongly suggest that IDFG apply this rule outside the PCA and eliminate bear baiting, particularly in big game units where grizzly bears "may be found" as identified in IDFG's Big Game Seasons and Rules.

Human-related grizzly bear mortalities remain the largest threat to grizzly bear recovery. Often these deaths are associated with bears accessing unsecured attractants and having to be removed due to a human safety concern via a management agency. On occasion they are killed by the landowner out of concern for safety. These types of deaths are most often avoidable. Bear-baiting, whether baiting with natural or un-natural attractants lures bears into a specific area. IDFG is taking a risk in

allowing bear baiting in occupied grizzly bear habitat. Grizzly bears will inevitably be drawn to these bait stations and may pose a human safety risk in the form of a surprise encounter or in defending the bait station as a food source. This may be exacerbated in years of poor natural food availability.

Bait stations can also be a source of grizzly bear mortality due to mistaken identity by hunters. In 2007 a grizzly bear was killed by a hunter over a black bear bait station in the Selway-Bitterroot Ecosystem. This was the first confirmed grizzly bear in the Selway-Bitterroot since 1946.

The State of Idaho's Yellowstone Grizzly Bear Management Plan states, "The Idaho Fish and Game Commission should consider promulgating a regulation which prohibits the baiting of grizzly bears for any purpose, including hunting, photography, viewing, etc." (pg.15). Baiting of black bears will indeed also "bait" grizzly bears and be contrary to the above mentioned recommendation. Therefore we encourage IDFG go further than simply switching recommended baits. Eliminating bear baiting in occupied grizzly bear habitat and areas where grizzly bears "may be found" would reduce the likelihood of grizzly bear conflicts over bait stations, improving safe conditions for hunters as well as minimizing unnecessary grizzly bear mortalities.

Thank you for the opportunity to comment.

Sincerely,

Erin Edge

Rockies and Plains Representative

Defenders of Wildlife

406-728-8800

Citations

Idaho's Yellowstone Grizzly Bear Delisting Advisory Team (DAT). State of Idaho Yellowstone Grizzly Bear Management Plan to Accompany HCR 62. Modified by House Resource and Conservation Committee. March 13, 2002.

Wyoming Game and Fish Commission. Black Bear Hunting Seasons. Chapter 3.

January 21, 2014

Jon Rachael State Wildlife Game Manager Idaho Fish and Game PO Box 25 Boise, ID 83707

Tel: (208) 334-2920

Re: GYC's Comments on Bear Baiting in Eastern Idaho

Dear Jon,

Following are comments of the Greater Yellowstone Coalition ("GYC") on the proposal to limit bear baiting in eastern Idaho to address safety concerns by reducing potential for food conditioning and creation of nuisance bears in grizzly bear habitat where it is currently legal to use bait to hunt black bears in eastern Idaho. The proposed rule will require that black bear hunters use only natural baits in occupied grizzly bear habitat to reduce the risk of creating more conflict bears as a result of food-conditioning to processed foods and other human-edible food products or garbage. We appreciate Idaho Department of Fish and Game's ("IDFG") recognition of the need to minimize risk of grizzly bear/human conflicts caused by bear baiting in grizzly bear habitat in eastern Idaho, and generally we support this proposal. However, we feel that this proposed rule does not go far enough to minimize and reduce conflicts, and we strongly suggest that IDFG consider banning black bear baiting in occupied grizzly bear habitat in eastern Idaho.

With its current prohibition on bear baiting in grizzly bear habitat adjacent to Yellowstone National Park and hunting units within the Primary Conservation Area for grizzly bears, IDFG has recognized the inherent conflicts that can result from bear baiting. And last year, IDFG recognized that bear/human conflicts created by bear baiting are an issue in the "Island Park area" when it proposed to ban bear baiting there. As IDFG recognizes, bear baiting also creates conflicts throughout other areas of southeastern Idaho where grizzly bears occur, creating human safety issues and the potential for lethal removal of grizzly bears. Grizzly bears are listed as Threatened under the Endangered Species Act, which grants the species special considerations and protections. Given their status as a listed species, we suggest that IDFG consider banning this practice in all occupied grizzly bear habitat. At a minimum, IDFG should eliminate this

source of conflict from within the geography defined as suitable habitat by the U.S. Fish and Wildlife Service.¹

Many areas on National Forest lands where bear baiting is allowed, for example, are within ½ mile of residences, especially in parts of Island Park, the Big Hole Mountain areas in Teton Valley, and homes south of the Centennial Mountains. This proximity leads to potentially serious conflicts between grizzly bears and homeowners. As IDFG acknowledges, bear baiting can lead to grizzly bears and black bears becoming habituated to human food, which in turn can lead grizzly bears to seek food rewards in homes and outbuildings on private lands or at campsites, leading to property damage, personal injury, and/or the lethal removal of the habituated bear.

Safety concerns also arise when humans come into an area where a grizzly bear has been drawn to a bait location. Grizzlies are known to guard bait as they would a carcass. For this reason, anyone recreating in the forest that stumbles upon a bait location may be in serious danger. Conflicts where grizzly bears are defending a food source have led to many human conflicts and even deaths in the past. To minimize these risks, GYC also requests that IDFG revisits closing more hunting units to bear baiting as grizzly bear populations expand.

Along the same lines, a common sense regulation that is currently employed in Wyoming that IDFG should consider halts the use of a bait site for the remainder of the season if a grizzly bear is found using it. This regulation reads:

Reporting Use of Bait by a Grizzly Bear. Any person registering a bait site, placing a bait, hunting at a bait site or witnessing the use of a bait site by a grizzly bear shall immediately report use of the bait by a grizzly bear to the Wyoming Game and Fish Department (1-877-WGFD-TIP). Regardless of the land status albeit Federal, State or private, no person shall hunt black bear over a bait site for the remainder of the current black bear hunting season. The bait site(s) shall be closed for the remainder of the current black bear hunting season and the bait shall be removed as soon as possible by personnel of the Wyoming Game and Fish Department.

IDFG clearly recognizes the problems associated with bear baiting in occupied grizzly bear habitat and we appreciate the agency taking steps toward curbing these potential conflicts. We urge IDFG to consider a rule that will truly help reduce conflicts in occupied grizzly bear habitat in southeastern Idaho. Therefore, GYC recommends that IDFG prohibit the use of bear baiting within all occupied grizzly bear habitat in southeastern Idaho. By doing so, IDFG can better protect public safety, property, pets, and the threatened grizzly bear, while still permitting the hunting of black bears.

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¹ <u>See</u> Servheen, Christopher, U.S. Fish and Wildlife Service, Grizzly Bear Recovery Plan, at http://www.fws.gov/mountain-prairie/species/mammals/grizzly/Grizzly_Bear_Recovery_Plan_March2013.pdf, at 8 (last visited January 15, 2014).

Sincerely,

Andrea Santarsiere

Andrea Santarsiere

Idaho Conservation & Legal Associate